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- 1 -

COMPLAINT

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ATTORNEYS FOR PLAINTIFFS

16

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

17

**COUNTY OF LOS ANGELES**

18

THISTLE BOOSINGER; ROE 1; ROE 2;

19

FARAAZ QURESHI; JAKOB JOHNSON; JACK KEARNS; AFNAN KHAWAJA;

20

DOLORES QUINTANA; CATHERINE 21

HAMILTON; ROE 8; SHANDRA CAMPBELL; ROE 6; ANGELICA JIT; ROE 15: ROE 9; ROE 22

10; ROE 3; ROE 14; BINYAMIN MORYOSEF; JAMES (JIMI) PERIC DEGEN; ISABELLA

23

LEE; ROE 4; AARON PALMER; MAHMOUD ALNAOUQ; JOSEPH MURPHY; GRAEME

24

BLAIR; ROE 5; ROE 11; LUBNA HAMMAD; 25

ROE 12; BHARAT VENKAT; ROE 7; GINA VIOLA PEAKE; ERIC WEFALD; ROE 13. 26

Plaintiffs,

27

V.

28

Case No.

## **COMPLAINT**

[Amount in Controversy Exceeds \$35,000]

[California Constitution Art. I, §13; Cal. Civ. Code §§ 52.1, 51.7; Government Code § 815.6; Cal. Penal Code § 13652; Cal. Code of Civil Procedure § 526a; Assault; Battery; Negligence]

- 2 -

## COMPLAINT

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REGENTS OF THE UNIVERSITY OF

CALIFORNIA, MICHAEL V. DRAKE, in his 2

Official Capacity as the President of the

University of California, in his

3

official capacity as President of the University of California, DARNELL HUNT, in his official

4

capacity as interim Chancellor of UCLA, 5

MICHAEL BECK, in his official capacity as Administrative Vice Chancellor of UCLA, 6

MONROE GORDEN, JR., in his official capacity as Vice Chancellor of UCLA, RICK

7

BRAZIEL, in his official capacity as Director of UCLA's Office of Public Safety, and

8

SCOTT SCHEFLER, in his official capacity as 9

Acting Chief of the UCLA Police Department; the CALIFORNIA HIGHWAY PATROL  
(State 10

of California); LOS ANGELES POLICE DEPARTMENT (the City of Los Angeles);

11

ISAAC BOKHOOR; MATIN MEHDIZADEH; TOM BIBIYAN; JARED RUBIN; EDWIN

12

KOHEN; NOURI MEHDIZADEH; EDAN ON; 13

EYAL SHALOM; RONALD MISHIYEV; JONATHAN YASHAR; DAVID

14

MERABI; ELIRAN BISMUT; ROY ELBAZ; BRAD HISLE; ARLAN MITNICK; MALACHI

15

JOSHUA MARLAN-LIBRETT; ALON ABISHOOR; RONY ABISHOOR; DANIEL

16

KHALILI; ANTHONY PROUZININ; and Does 17

1-100

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Defendants and Respondents.

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### INTRODUCTION

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1. This case is about the University of California, Los Angeles (“UCLA”) repeatedly 3  
and systemically violating the civil rights of students, faculty, and community members  
who 4

protested against a genocide in Palestine and UCLA’s investment in companies that profit  
from that 5

genocide. Because of UCLA’s relentless discriminatory crusade against people expressing  
a pro 6

Palestinian viewpoint, a violent mob—comprised of self-described Zionists and members  
of far 7

right extremist groups, among others—ruthlessly attacked protesters for hours beginning  
on April 8

30, 2024, while the UCLA Police Department (“UCPD”) and private security companies  
stood and 9

watched.

10

2. Mob members violently assaulted protesters wearing keffiyehs, hijabs, and other 11

symbols of pro-Palestinian viewpoints, in some instances breaking their bones, sexually  
assaulting 12

them, burning their eyes with chemical munitions, punching them, hitting them with metal  
rods, poles, and boards, and hurling incendiary devices into the peaceful  
encampment.<sup>1</sup> 13

14

3. Mob members acted as a group, making coordinated moves. They put larger people 15  
up front to break the protestors' line—assaulting protestors physically, blasting bullhorns in  
their 16

ears, and jabbing flagpoles into the encampment, striking people inside. The mob  
members seemed 17

to be enjoying themselves, socializing in between brutalizing protestors. They shot  
chemical 18

munitions, laughed and joked about it, planned the next attack, and then attacked the  
protestors 19

again.

20

4. The unhinged mob violently, brutally, and relentlessly attacked the pro-Palestine 21  
protestors in the Palestine Solidarity Encampment at UCLA for five hours beginning on April  
30, 22

2024. It was the worst night of violence against pro-Palestinian protestors in all of 2024's  
campus 23

protests around the country.

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<sup>1</sup> Robin D.G Kelley, *UCLA's Unholy Alliance*, BOSTON REVIEW (May 18,  
2024), <https://www.bostonreview.net/articles/uclas-unholy-alliance/>.

## COMPLAINT

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5. Not a single member of the mob attack was arrested that night, even though police 2  
and private security watched from just a few yards away as the attack raged for hours and  
was broadcast live to millions of people across the country and in Los Angeles.<sup>2</sup>

3

4

6. After this hate-filled mob attack ended, and while many protesters were still seeking 5  
medical attention for their injuries, the encampment's peaceful demonstrators faced a  
phalanx of 6

militarized police on May 1, 2024. UCLA and UCPD asked the Los Angeles Police  
Department 7

("LAPD") and the California Highway Patrol ("CHP") to forcibly remove people expressing  
pro 8

Palestinian views. Police hurled flashbangs, shot powerful kinetic impact projectiles at  
peoples' 9

heads and faces, and used excessive physical force against and falsely arrested students,  
faculty, and 10

concerned community members. Protesters were dragged, beaten, and body slammed by  
cops 11

during this hours-long raid on the encampment. Over 200 pro-Palestinian protesters were  
arrested, 12

with many reporting invasive searches, false arrests, and public humiliation during their  
arrest and 13

detention.

14

7. On June 10, 2024, pro-Palestinian protesters were once again attacked by militarized 15

police forces, falsely arrested, beaten, shot with less lethal munitions, and had their civil rights 16

violated.

17

8. UCLA has a long and well-documented history of discriminating against pro 18

Palestinian views, whether the people expressing them are Muslim, Jewish, Christian, atheist, 19

agnostic, or of any other faith. This hostile environment is marked by anti-Palestinian, anti-Arab, 20

anti-Muslim, and Islamophobic incidents and a complete erasure of Jewish criticism of Israel, Zionism, and the impact of both on Palestinians.<sup>3</sup>

21

22

9. Between October 7, 2023, and April 2024, pro-Palestinian students faced physical 23 attacks, threats of violence, and harassment, including Islamophobic slurs. One student was held at 24

25

<sup>2</sup> Robin D.G Kelley, *UCLA's Unholy Alliance*, BOSTON REVIEW (May 18,

26

2024), <https://www.bostonreview.net/articles/uclas-unholy-alliance/>.

<sup>3</sup> See the UCLA taskforce report on anti-Palestinian, anti-Muslim, and anti-Arab racism at UCLA- Gaye Johnson, 27

Sherene Razack et al, *Report Of Task Force On Anti - Palestinian, Anti - Muslim And Anti - Arab Racism, Corrected May 15 Report*, at 1 (May 15 2024), [https://www.dropbox.com/scl/fi/k6qkx97jdfrg61i6vlnxq/CORRECTED-MAY-15-](https://www.dropbox.com/scl/fi/k6qkx97jdfrg61i6vlnxq/CORRECTED-MAY-15-REPORT-OF-TASK-FORCE-ON-ANTI.pdf?rlkey=j82r8gn89i03yclzn6hcxgz3u&e=1&st=6s3n3uvu&dl=0)

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REPORT-OF-TASK-FORCE-ON

ANTI.pdf?rlkey=j82r8gn89i03yclzn6hcxgz3u&e=1&st=6s3n3uvu&dl=0.

## COMPLAINT

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knifepoint by a Zionist counter protester who disrupted a rally near UCLA in Westwood.

Muslim 2

women wearing hijabs were threatened and verbally abused. Students wearing keffiyehs and other 3

pro-Palestine clothing were attacked with chemical munitions, assaulted, and threatened with rape 4

and other violence on campus. Despite reports to authorities, UCLA took no action to safeguard 5

students or hold perpetrators accountable.

6

10. The events at UCLA highlight systemic anti-Palestinian bias and the administration's 7

failure to uphold its obligation to protect the rights of students and faculty to engage in peaceful protest and expression.<sup>4</sup> The university's actions and omissions have not only fostered an unsafe 8

9

and hostile environment but have also violated the constitutional rights of those advocating for 10

Palestinian rights, particularly their rights to free speech and assembly under Article 1, §2 of the 11

California Constitution.

12

11. This action seeks to hold UCLA accountable for its failure to address and prevent 13

Islamophobic, anti-Palestinian and anti-Arab discrimination, its violation of civil rights of all pro 14

Palestinian protesters—a group comprised of a wide range of people including Jewish people—and 15

to demand systemic changes to ensure the safety and equity of all members of the university 16

community.

17

12. This action also seeks to hold individual members of the mob that attacked the 18

Palestine Solidarity Encampment accountable for brutally beating and terrorizing protesters because 19

of their pro-Palestine political views and activity, as well as those who financed, organized, and 20

encouraged the attacks.

21

13. Plaintiffs seek to enjoin UCLA's practice and policy of punishing pro 22

Palestinian speech, a declaration that law enforcement's violent actions in clearing the 23

Palestine Solidarity Encampment were unlawful, and fair compensation for violation of their 24

rights—including the unlawful use of force, assault, battery, and civil rights violations—by 25

UCLA, police, and the mob. Because UCLA refuses to disclose the nature and extent of its 26

27

<sup>4</sup> Gaye Johnson, Sherene Razack et al, *Second Report of the UCLA Task Force on Anti-Palestinian, Anti-Muslim, and Anti-Arab Racism: the Militarization of Campus - The Racial Violence Hub*, THE RACIAL VIOLENCE HUB at 15

28

(June 28, 2024), <https://racialviolencehub.com/second-report-of-the-ucla-task-force-on-anti-palestinian-anti-muslim-and-anti-arab-racism-militarization-of-campus/>

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COMPLAINT

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investments in companies profiting from genocide, population removal, and other international 2

crimes, UCLA will continue to be a site of rallies and protests, and Plaintiffs are likely to encounter 3

the same repression unless it is enjoined.

4

## **FACTUAL BACKGROUND**

5

### **A. UCLA HAS HISTORICALLY BEEN HOSTILE TO PRO-PALESTINIAN** 6

#### **ADVOCACY**

7

14. UCLA has long been a hostile environment for Arab and Palestinian students, 8  
faculty, and staff.<sup>5</sup> Incidents include harassment of faculty for teaching material critical of  
Israel, 9

profiling of Muslim and Arab students, and administrative indifference to racism. A  
notable 10

example is the 2012 report by UC President Yudof's Advisory Council, co-authored by a  
pro-Israel 11

lobbyist, which equated criticism of Israel with anti-Semitism and targeted pro-Palestinian  
activism. 12

Then-Chancellor Gene Block endorsed this report, setting a tone of administrative  
hostility. 13

15. In 2012, Professor David Shorter faced a smear campaign and threats after  
including 14

pro-Boycott, Divestment, and Sanction material in a course he was teaching. UCLA's 15  
administration failed to support him during this ordeal. Muslim and Arab students have  
been 16

profiled and shadowed by campus police while targeted Islamophobic acts, such as  
leaving raw 17



pork at a Muslim student's door were ignored. In 2023, UCLA students wearing hijabs were 18

exploitatively recorded, leading to online harassment and calls for their expulsion. These incidents 19

reflect a broader pattern of anti-Palestinian, anti-Arab, and Islamophobic racism, compounded and 20

burgeoned by administrative inaction.

21

16. In 2014, students seeking divestment from companies supporting the Israeli 22

occupation were harassed, doxxed, and threatened with violence. Non-university Zionist groups 23

brought Israeli soldiers to campus to intimidate students, often filming them without consent. 24

Chancellor Block ignored repeated appeals to address these concerns, prioritizing meetings with 25

pro-Israel groups over the safety of pro-Palestinian students.

26

27

<sup>5</sup> Gaye Johnson, Sherene Razack et al, *Report Of Task Force On Anti - Palestinian, Anti - Muslim And Anti - Arab Racism, Corrected May 15 Report*, at 1 (May 15

28

2024), <https://www.dropbox.com/scl/fi/k6qkx97jdfrg61i6vlnxq/CORRECTED-MAY-15-REPORT-OF-TASK-FORCE-ON-ANTI.pdf?rlkey=j82r8gn89i03yclzn6hcxgz3u&e=1&st=6s3n3uvu&dl=0>

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COMPLAINT

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17. Faculty members who spoke out about Palestine also faced institutional backlash. 2

Courses that explored Palestinian history and human rights were scrutinized, and professors teaching these subjects were often accused of spreading propaganda.<sup>6</sup> In one instance, a faculty 3

4

member was denied tenure solely as a result of complaints from national pro-Israel advocacy groups 5

that are not part of the UCLA community, despite that professor's otherwise impeccable teaching 6

record and strong support from UCLA students and colleagues.

7

18. The administrative atmosphere discouraged many Arab and Palestinian students, as 8  
well as Jewish and other students who supported human rights for Palestinians, from  
openly 9

engaging in activism or expressing their views. Several students reported receiving  
anonymous 10

threats, while others experienced heightened surveillance during campus events. This  
environment 11

of intimidation had a chilling effect on free speech and academic discourse surrounding  
Palestinian 12

issues.

13

19. The repression of Palestinian and Muslim students and those who associate with  
and 14

support them stands in stark contrast to UCLA's tolerant approach to other protests.  
Whether it was 15

the protests following the police killing of Michael Brown, Jr., or the murder of George Floyd,  
the 16

UAW strikes, protests against apartheid, Vietnam, or virtually any protest that has ever  
occurred at 17

UCLA, the Palestine exception to freedom of expression and association has been in full force. 18

20. UCLA faculty have been harassed for teaching material deemed critical of Israel, 19 some subjected to McCarthy-style witch hunts violating academic freedom and freedom of expression in service of national pro-Israel lobbying groups.<sup>7</sup> Muslim and Arab students have been 20

21

profiled and shadowed by campus police and have been threatened for wearing clothing associated 22

with pro-Palestinian views.

23

21. As recently as three weeks ago, a poster inside an Arab-American faculty member's 24 office that simply read "Teach Palestine" was ripped off the wall while someone screamed he was a 25

26

<sup>6</sup> Gaye Johnson, Sherene Razack et al, *Third Report of the UCLA Task Force on Anti-Palestinian, Anti-Muslim, and* 27

*Anti-Arab Racism - The Racial Violence Hub*, THE RACIAL VIOLENCE HUB at 4 (Jan. 31, 2025), <https://racialviolencehub.com/third-report-ucla-task-force-anti-palestinian-anti-muslim-anti-arab-racism/> 28

<sup>7</sup> Robin D.G Kelley, *UCLA's Unholy Alliance*, BOSTON REVIEW (May 18, 2024), <https://www.bostonreview.net/articles/uclas-unholy-alliance/>.

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## COMPLAINT

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"terrorist sympathizer" who should be banned from campus. Although the faculty member filed an 2

internal complaint, UCLA has taken no action.

3

22. Not only has the university for years refused to take any kind of action against this 4 harassment, but former Chancellor Block also harbored nakedly racist, anti-Palestinian sentiments. 5

Throughout all these years, the upper administration—especially former Chancellor Block—refused 6

to engage with appeals, even from senior faculty members, about the increasingly racist and hostile 7

environment on campus.

8

23. When Students for Justice in Palestine (“SJP”) held their national conference at 9 UCLA in 2018, pro-Palestinian advocates faced violent attacks from outside protesters and received 10

no support from UCLA. Then-Chancellor Gene Block published an editorial asserting that SJP was 11

antisemitic for its support of the boycott, divestment, and sanctions movement. 12

**B. OCTOBER 7, 2023 to APRIL 24, 2024: HARASSMENT OF PRO-PALESTINIAN** 13

**STUDENTS INCREASES RAPIDLY**

14

24. On October 7, 2023, Hamas conducted an armed operation on Israeli military 15 installations and towns. The attack left approximately 300 Israeli soldiers and over 900 civilians 16

dead, and approximately 240 were abducted and taken to Gaza. At the UCLA campus, students 17

were genuinely shell-shocked and saddened by the sudden loss of life.

18

25. When Israel’s leadership announced its genocidal intent in Gaza, the mood at UCLA 19

shifted. Many students and faculty felt betrayed by one-sided, acontextual university statements that 20

focused their attention only on the Hamas attack and not the immediate, destructive actions of the 21

Israeli Defense Forces, let alone the history of occupation and apartheid-like oppression that preceded the October 7 attack.<sup>8</sup>

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<sup>8</sup> UCLA Faculty for Academic Freedom, *Op-ed: UCLA must protect free speech, academic freedom of those advocating for Palestine* - *Daily Bruin*, DAILY BRUIN (Dec. 5, 2023), <https://dailybruin.com/2023/12/05/op-ed-ucla-must-protect> 28

[free-speech-academic-freedom-of-those-advocating-for-palestine](#).

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## COMPLAINT

26. The Israeli response to the attack constituted a violation of the genocide convention<sup>9</sup>, 1

2

war crimes, and crimes against humanity, with widespread airstrikes, ground incursions, deliberate 3

destruction of Gaza's water system, and an intensive blockade of Gaza—all broadcast by Israeli 4

leadership, funded by the U.S. government and supported by UCLA university officials. These 5

actions targeted civilian infrastructure, including schools, hospitals, and shelters, resulting in mass 6

casualties and destruction. The intentional targeting of civilians and the systematic deprivation of 7

essential resources like water, food, and electricity meet the definitions of genocide under 8

international law. Students and faculty on campus identified these atrocities as part of a broader 9

campaign of ethnic cleansing and systemic violence against Palestinians.

10

27. Israel's genocidal acts after Hamas's October 7 attack, along with UCLA's response, 11

triggered a wave of pro-Palestinian activism and anti-Palestinian violence at UCLA. 12

28. Harassment and violence directed at Palestinians, Arabs, Muslims, and solidarity 13

activists proliferated. Students were physically attacked in Westwood by Zionist protesters; one 14

student had a knife held to their throat by a Zionist protestor. UCPD officers did not intervene 15

beyond asking the attackers to leave.

16

29. On October 11, 2023, faculty held a teach-in about the crisis in Gaza. Before the 17  
teach-in began, threatening messages were shared in public and private chat rooms,  
leading 18

organizers to decide to move the event online. Participants were attacked both in person  
and online 19

by pro-Israel protesters.

20

30. Approximately fifteen (15) students went to the originally planned in-person teach-  
in 21

location in Kaplan Hall because they did not know the teach-in had moved online for safety reasons. 22

23

<sup>9</sup> “After reviewing the facts established by independent human rights monitors, journalists, and United Nations agencies, we conclude that Israel’s actions in and regarding Gaza since October 7, 2023, violate the Genocide

24

Convention. Specifically, Israel has committed genocidal acts of killing, causing serious harm to, and inflicting conditions of life calculated to bring about the physical destruction of Palestinians in Gaza, a protected group that forms

25

a substantial part of the Palestinian people.” University Network For Human Rights International Human Rights Clinic Boston University School Of Law International Human Rights Clinic Cornell Law School Centre For Human Rights,

26

University Of Pretoria Lowenstein Human Rights Project, Yale Law School, *Genocide In Gaza Analysis Of International Law And Its Application To Israel’s Military Actions Since October 7, 2023*, UNIVERSITY NETWORK

27

FOR HUMAN RIGHTS (May 15,

2024),

<https://static1.squarespace.com/static/66a134337e960f229da81434/t/66fb05bb0497da4726e125d8/1727727037028>

[94/Genocide+in+Gaza+-+Final+version+051524.pdf](#).

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COMPLAINT

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Seven men went to that location and intimidated and harassed the students. When these men 2

arrived, the attendees were sitting on the floor, watching the Zoom event. The men called them 3

“terrorists,” “baby murderers,” and “killers,” and threatened violence against them. One said, “I’m 4

gonna rip your head off” and “You better fucking run from me you terrorist.” The men grabbed the 5

students’ laptops and threw them onto the floor and into the trash. As students attempted to leave, 6

one of the men blocked their exit, physically intimidated them, and screamed at them. 7

31. On October 12, 2023, students faced verbal and physical assaults from pro-Israel 8 protesters. Muslim women in hijabs and keffiyehs were specifically targeted with threats of rape 9

and killing, and racial and religious slurs. The mob shoved students, forcing them to form human 10

barriers for protection. Despite the visibility of these events, UCLA officials refused to take any 11

measures to dissuade perpetrators or hold them accountable for their violence.

12

32. By October 30, 2023, Islamophobic incidents at UCLA escalated. Two students 13 wearing hijabs were filmed without consent, resulting in online death threats and harassment. The 14

same day, a man carried a sign equating Islam with Nazism during a pro-Israel rally attended by 15

UCLA administrators.

16

33. Pro-Palestinian students, fearing the escalating attacks and unable to rely on UCLA 17 to protect them, created their own safety protocols, including escorting one another while on 18



campus or walking home. The group prioritized providing safety escorts to Muslims and Muslim 19

appearing people wearing hijabs or keffiyehs.

20

34. Faculty at UCLA, the UC Ethnic Studies Faculty Council, and a group of Palestinian 21  
faculty with members across twelve schools and seven campuses wrote to the University  
of 22

California, alerting it to the dangers of its rhetoric and the consequences that pro-  
Palestinian students were already experiencing.<sup>10</sup> UCLA's leadership took no steps to  
protect students. 23

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<sup>10</sup> Gaye Johnson, Sherene Razack et al, *Report Of Task Force On Anti - Palestinian, Anti -  
Muslim And Anti - Arab Racism, Corrected May 15 Report*, at 8 (May 15

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2024), [https://www.dropbox.com/scl/fi/k6qkx97jdfrg61i6vlnxq/CORRECTED-MAY-15-  
REPORT-OF-TASK-FORCE ON-](https://www.dropbox.com/scl/fi/k6qkx97jdfrg61i6vlnxq/CORRECTED-MAY-15-REPORT-OF-TASK-FORCE-ON-ANTI.pdf?rlkey=j82r8gn89i03yclzn6hcxgz3u&e=1&st=6s3n3uvu&dl=0)

[ANTI.pdf?rlkey=j82r8gn89i03yclzn6hcxgz3u&e=1&st=6s3n3uvu&dl=0](https://www.dropbox.com/scl/fi/k6qkx97jdfrg61i6vlnxq/CORRECTED-MAY-15-REPORT-OF-TASK-FORCE-ON-ANTI.pdf?rlkey=j82r8gn89i03yclzn6hcxgz3u&e=1&st=6s3n3uvu&dl=0)

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COMPLAINT

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35. On October 31, 2023, Associate Vice Chancellor of Campus Life Mike DeLuca 2

laughed and joked with Zionist protesters while a man walked through a rally with a sign  
equating 3

Islam to terrorism and Nazism. UCLA officials took no steps to intervene.

4

36. The anti-Arab, anti-Muslim, and anti-Palestinian harassment and assault continued 5  
between November 2023 and April 2024 and included the following incidents, many of  
which were 6

part of a formal complaint to the Department of Education's Office of Civil Rights: a Black  
student 7

in a keffiyeh being sprayed with chemical munitions and repeatedly followed on campus;  
UCPD 8

detaining pro-Palestinian protesters for removing an offensive poster; UCLA officials failing  
to 9

respond to the Task Force On Anti-Palestinian, Anti-Arab, and Anti-Muslim Racism; and  
the 10

invitation of Israel's former foreign minister Tziporah Livni to speak at UCLA, among  
others. 11

**C. APRIL 25, 2024 to MAY 2, 2024: PALESTINE SOLIDARITY ENCAMPMENT, THE 12**  
**MOB ATTACK, AND POLICE RAID**

13

**April 25, 2024: The Palestine Solidarity Encampment Begins in Peace**

14

37. In April 2024, students nationwide protested against Israel's genocidal acts in 15  
Palestine, the United States government's funding for it, and universities' refusal to divest  
from 16

companies profiting from it. UCLA was no different.

17

38. Motivated by the genocide of the Palestinian people in Gaza and by the UCLA 18  
administration's repression of pro-Palestine students and simultaneous tolerance for,  
and 19

encouragement of, their Zionist attackers, students established the Palestine Solidarity  
Encampment 20

on Royce Quad on April 25, 2024, to amplify their demands and keep themselves safe. 21  
39. Royce Quad is approximately 190 yards long and over 70 yards deep. Four buildings 22  
have entrances facing Royce Quad: Powell Library, Royce Hall, Haines Hall, and Kaplan  
Hall. 23

Each of these buildings has multiple entrances besides the entrances facing Royce  
Quad. 24

40. The only walkway encumbered by the encampment was the brick walkway between 25  
Royce Hall and Powell Library. Students could walk around the encampment to get  
between the 26

two buildings, adding about one minute to their walk.

27

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- 13 -

## COMPLAINT

1

41. Access to Tongva steps was not restricted by the encampment, nor were the East 2  
West sidewalks of Royce Quad. Any restrictions to academic buildings were made by  
UCLA, not 3  
the encampment.

4

42. The encampment area was set back from the entrances to Royce Hall and Powell 5  
Library, such that steps, entrances, and walkways surrounding these buildings were  
freely 6

accessible. Both buildings could be easily accessed from their normal entrances (and  
these wide 7

areas were later filled with Zionist counter-protestors, including during the daytime).  
UCLA 8

administration opted to close the entrances proximate to the encampment, as announced in a 9

BruinALERT.

10

43. The encampment was a peaceful expression of dissent, demanding divestment from 11

companies complicit in the Israeli occupation and demanding transparency in UC investments. The 12

encampment included Jewish Seder services and Muslim prayer services—both of which were 13

disrupted by the mob outside the encampment—and lectures and book discussions led by faculty 14

and graduate students, all while maintaining a strict policy of non-engagement with the mob 15

brewing outside the perimeter of the community space.

16

44. The encampment included a library, food available to everyone, and a medical tent. 17

There were film screenings, reading groups, and education sessions on the history of Israel 18

Palestine.

19

45. People entering the encampment were asked to agree to certain safety protocols.

No 20

one was prohibited from the encampment unless their actions were disruptive or a safety threat. 21

46. UCLA was immediately aware of the encampment and quickly released public 22

statements and a message to the UCLA community. UCLA officials told students, faculty, and staff 23

they were aware of the encampment, that it was peaceful, aligned with the right to free expression, 24

and minimally disruptive. Classes continued as planned. UCLA announced that it had restricted 25

access to Royce Hall and Powell Library but that everyone could enter from other entrances not 26

directly facing the Royce Quad.

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- 14 -

## COMPLAINT

1

### **April 27, 2024: Counter Protesters Escalate Their Violence**

2

47. On April 27, 2024, Administrative Chancellor Michael Beck sent an email to faculty 3 stating that university officials had permitted a large pro-Israel counter protest for the next day. He 4

told Randall Kuhn, a public health professor at UCLA, that a counter protest would not risk student 5

safety. He further stated that counter protesters do not want to “pick a fight”.

6

48. Later that day, counter-protesters brought weapons, including a large sword that was 7 confiscated by police, and threatened encampment members with violence, all while hurling racial 8

and ethnic slurs. However, though UCLA officials were regularly in and around the encampment, 9

they did not take any action to curb the dangerous acts of the counter-protestors—not even against 10

the person brandishing a sword.

11

49. Counter protestors physically harassed and verbally threatened students in the 12  
encampment, attempting to enter the encampment to attack students and destroy  
encampment 13

members' property. Although Darnell Hunt and other UCLA administrators were repeatedly  
told of 14

these events, they did not act to prevent escalating counter protestor violence and did not  
direct the 15

UCPD to do so.

16

#### **April 28, 2024 and April 29, 2024: The Jumbotron Escalates Mob Violence** 17

50. At about 9:00am on April 28, 2024, counter protesters erected a large Jumbotron in 18  
the area immediately adjacent to the encampment upon documented approval from the  
UCLA 19

Administration. The main counterprotest was led by the Israeli American Council (IAC).  
By 20

10:30am, there were about 1,000 pro-Israel counter protesters immediately adjacent to  
our 21

encampment.

22

51. Counter protesters pushed, spat on, punched, sexually harassed, and yelled slurs  
at 23

us. They also held up racist and Islamophobic signs. One sign, for example, read "Palestine  
looks 24

like" and featured a swastika and a scene of a woman being sexually assaulted. At about  
2:00 pm, 25

UCPD officers arrived in riot gear. Counter protesters clapped, cheered, and exclaimed “God Bless 26

LAPD!” in response. As UCPD officers file in on the side of the counter-protest, counter protesters 27

chant “L-A-P-D! WE LOVE YOU!” A counter protester yelled through a megaphone, “Let’s leave! 28

It’s their turn now”, thus making way for the police to file in.

- 15 -

## COMPLAINT

1

52. Later that day, UCLA stood by as the counter protesters set up a jumbotron with 2 extremely loud stadium-sized speakers immediately next to the encampment, without a permit. It 3

remained there through May 2, 2024. This served as a siren song for the mob to assemble—it even 4

gave them a place to do so, from which they eventually launched a violent mob attack on April 30, 5

2024. It also signaled to the mob that UCLA would not interfere with their campaign against the 6

encampment.

7

53. The jumbotron played a loop of clips of graphic descriptions of rape and sexual 8 violence, sounds of gunshots, screaming babies, clips of President Biden pledging unconditional 9

support for Israel, and extremely loud amplified music, including a loop of the Israeli song ‘Meni 10

Mamtera,’ a children’s song Israeli soldiers used to torture Palestinian captives. 11

54. At night, the noise and light from the jumbotron made it impossible for encampment 12

members to sleep. During the day, it interrupted teaching and research. The audio could be heard at 13

high volume in classrooms and offices in Kaplan Hall and Haines Hall. Multiple faculty members 14

filed Title IX complaints, including at least one survivor of sexual assault who had to walk by the 15

jumbotron to go to work and felt that the images and audio were triggering. One faculty member 16

reported the jumbotron to two deans and requested that they expedite its removal. 17

55. UCLA administration knew about the jumbotron and knew that it was inciting even 18 more aggression among violent mob assembling outside the encampment. Administrators were 19

regularly present at the encampment site. Administrative Vice Chancellor Michael Beck visited 20

several times. Beck negotiated with encampment leaders about various safety-related topics and 21

transmitted messages to and from the UCLA administration. Several deans were observed at the 22

encampment site during this period. Throughout these visits, students and faculty alike warned the 23

administrators about the steadily escalating violence against them and the grave danger that it would worsen.<sup>11</sup>

24

25

26

<sup>11</sup> See the UCLA taskforce report on anti-Palestinian, anti-Muslim, and anti-Arab racism at UCLA- Gaye Johnson, 27

Sherene Razack et al, *Report Of Task Force On Anti - Palestinian, Anti - Muslim And Anti - Arab Racism, Corrected May 15 Report*, at 8 (May 15 2024), <https://www.dropbox.com/scl/fi/k6qkx97jdfrg61i6vlnxq/CORRECTED-MAY-15->



REPORT-OF-TASK-FORCE-ONANTI.pdf?rlkey=j82r8gn89i03yclzn6hcxgz3u&e=1&st=6s3n3uvu&dl=0- 16 -

## COMPLAINT

1

56. UCLA also knew about the jumbotron because UCLA Fire Marshal Ricardo Barboza 2  
also regularly visited the encampment to make requests, including about how the  
encampment was 3

physically organized, all in the shadow of the jumbotron.

4

57. Representatives from the UCLA Student Affairs and Student Organizations, 5  
Leadership, and Engagement (“SOLE”) offices were present nearly continuously during the  
day and 6

sometimes in the evening, including Mick DeLuca, Philip Goodrich, Kristopher Kaupalolo,  
and 7

Jason Zeck. Officers from UCPD and private security companies were also present,  
especially after 8

the first day, and were there all day and night.

9

58. On April 29, 2024, faculty and students organized a walkout in support of the  
student 10

demands and their presence in the encampment. The walkout was also in response to  
UCLA’s 11

failure to protect students from violence from Zionist counter protesters.

12

59. Faculty gathered at Royce Hall to demand accountability from the UCLA 13

administration. Speeches emphasized solidarity with the encampment and condemned the UCLA 14

administration's failure to protect students from the harm that had occurred and the danger of 15

further attacks and increasing violence. On information and belief, these speeches were heard by 16

more than one of the UCLA defendants, and the warnings from those speeches regarding the 17

imminent violent attacks were reported to these UCLA defendants. Abandoned, the encampment 18

members had to work to enhance their own safety after increased threats and the University's 19

refusal to address those threats.

20

60. That same day, tensions escalated further when a student raised a Palestinian flag 21 atop scaffolding near Powell Library. Police forcibly removed the students, knocking them 22

unconscious during the arrest and denying them immediate medical aid. This police violence drew 23

widespread criticism.

24

### **April 30, 2024: The Mob Attack**

25

61. At approximately 5 p.m. on April 30, 2024, UCLA declared the encampment 26 unlawful. Despite evidence that violence was almost entirely initiated by the group of counter 27

protesters who would attack the encampment later that night, Chancellor Block framed the 28

encampment as the source of disruption.

## COMPLAINT

1

62. At approximately 10:30 PM, after UCLA officials' statements throughout the day 2 that made clear the university would not impinge the mob's activity, the mob attacked. An initial 3

group of dozens of men approached the Southeast corner of the encampment, some in Guy Fawkes 4

like white masks and some draped in Israeli flags. While the loud sound of crying babies played on 5

the jumbotron, these men wielded chemical munitions, hammers, knives, stink bombs, commercial 6

grade fireworks, baseball bats, and metal and wooden rods.

7

63. The mob sprayed chemical munitions at encampment members, yanked away boards 8

and metal barricades, and hurled themselves at the encampment. Encampment members thought the 9

mob was shooting at them. Men in full-faced white masks began breaking down the barriers using 10

knives, hammers, and their feet. One, armed with a long metal rod, tried to spear people in the 11

spine. Another member of the mob launched planks of wood into the encampment, striking a young 12

woman in the back of the head.

13

64. Encampment members witnessed the mob's extreme violence, threats of violence, 14 and UCLA's failure to intervene. They saw people get their heads split open, suffer from open 15

wounds and concussions, scream in pain and fear, with fireworks and mayhem all around them. 16

They heard the racist, anti-Palestinian, Islamophobic insults and the threats of rape. As the mob 17

became more menacing, UCLA private security did nothing—and then fled the area. For hours, 18

encampment members were alone as the mob attacked; private security had left and police had not 19

yet arrived. It was immediately apparent that there was not a semblance of protection for the 20

physical safety of the encampment members, and the mob had successfully transformed a peaceful, 21

interfaith community space into a site of horror.

22

65. The mob shot multiple incendiary fireworks into the encampment, which was filled 23  
with flammable tents. One student frantically used a fire extinguisher to prevent any of  
the 24

fireworks sparks from setting the tents ablaze.

25

66. In the first few minutes, and continuing sporadically throughout the hours-long mob 26  
attack, attackers sprayed various chemical munitions into the eyes of encampment  
members. 27

67. For nearly five hours that night, from approximately 10:30 p.m. until 3:15 a.m., the 28  
mob attack raged on. Mob members coordinated their attacks, taking turns spraying  
irritants at,

- 18 -

COMPLAINT

1

punching, kicking, spitting on, screaming at, and throwing objects at the bodies of  
encampment 2

members—from glass bottles to whole six-foot-long metal barricades. They got a running  
start back 3

on the grass of the Eastern portion of Royce Quad and slammed themselves into part of  
the 4

encampment's fortifications, dragging out pro-Palestinian protesters to further attack  
them. When 5

they could make no more progress, they fell back a few yards and regrouped in  
coordination. 6

Shortly after, they focused their attack on a new part of the encampment. They moved back  
and 7

forth up and down the barricades, coordinating their actions to launch and relaunch their  
attacks in 8

an unremitting tirade.

9

68. For many pro-Palestinian protesters, the scene evoked images they had personally 10  
experienced in Palestine, with Israeli soldiers standing by menacingly while illegal Israeli  
settlers 11

attacked or killed Palestinians under their watch.

12

### **May 1, 2024 to May 2, 2024: The Police Raid**

13

69. Less than twelve (12) hours after encampment members survived the violent mob 14  
attack, police spent the following day setting the stage for their own raid on the  
encampment. From 15

the late hours of May 1, 2024, to the early morning of May 2, 2024, law enforcement  
agencies, 16

including the CHP and LAPD, began their raid on the encampment. Officers targeted barricades 17

with flashbangs, forcibly removing and arresting students, faculty, and community members. 18

Reports detailed severe injuries, including burns, respiratory issues, and head trauma, all caused by 19

excessive police force.

20

70. Pro-Palestinian protesters witnessed the police force's extreme violence and threats 21

of violence against their fellow peaceful protestors. They saw fingers shot off, people dragged and 22

thrown by police, zip ties cut into wrists, and people being threatened with live fire. They knew they 23

were being arrested for their pro-Palestinian activity, not a violation of the law. 24

71. Over 200 individuals were arrested during the raid, and many were subjected to 25  
invasive searches, false arrests, sexual assaults, and prolonged detentions. Protesters reported being 26

unmasked and paraded before cameras, their identities exposed without consent. Women wearing 27

hijabs were forced to remove them, infringing on their religious practices.

28

- 19 -

## COMPLAINT

1

72. By 6:00 AM on May 2, 2024, the encampment had been completely leveled. 2

UCLA's response drew condemnation from human rights organizations and advocacy groups, who 3

criticized the administration for prioritizing external interest groups over the safety and 4

constitutional rights of its own students and community.

5

73. In the aftermath, student groups continued their advocacy through teach-ins and 6 rallies. The events highlighted systemic issues within UCLA's administration, including its failure 7

to protect marginalized communities and its complicity in perpetuating structural violence. 8

74. The events at UCLA underscore systemic bias and administrative failure to protect 9 pro-Palestinian advocates from harassment and violence. While the encampment sought to foster 10

dialogue and accountability, the university's actions reflected a pattern of suppressing dissent and prioritizing interest group pressures over community safety and equity.<sup>12</sup>

11

12

### **June 10, 2024: Kettling and Police Shootings**

13

75. The organizers of the Palestine Solidarity Encampment advertised a memorial march 14

to begin in the early afternoon on June 10, 2024, to honor the lives of Palestinians in Gaza killed by 15

Israeli Defense Forces since October 7, 2023. The march, with almost 200 participants, started at 16

approximately 2 p.m. next to the Bruin bear sculpture in Bruin Plaza, a central outdoor space for 17

undergraduates and a common site for rallies.

18

76. After several hours and multiple location changes, the marchers arrived in their 19 funeral procession at Shapiro Court, reading the names of those killed in Gaza.

20

77. At approximately 8 p.m., police with batons and 40mm weapons loaded with high speed kinetic impact projectiles—what the police term “less than lethal” munitions—including

rubber bullets and pepper bullets, assembled near the marchers.

23

78. As over a hundred protesters made up of students, faculty, and staff attempted to exit

from the South side of the courtyard, they were met with another line of UCPD officers who did not

allow them to leave.

26

27

<sup>12</sup> Maya Vibhakar, *UCLA academic departments release statements condemning handling of encampment* - Daily

*Bruin*, DAILY BRUIN (May 4, 2024), <https://dailybruin.com/2024/05/04/ucla-academic-departments-release-statements-condemning-handling-of-encampment>.

- 20 -

## COMPLAINT

1

79. Marchers, all attempting to disperse and avoid physical confrontation with UCPD, were now being dangerously kettled into a very tight space toward the South exit.

80. A UCPD officer yelled at the crowd to move, but there was nowhere to go. Police blocked all means of exit.

5

81. Police pulled marchers, grabbing arms, legs, and torsos as well as clothing and backpacks. Officers hit marchers with their batons, hands, and feet as they arrested them. Some



marchers were choked, attacked, and stepped on by officers.

8

82. Officers fired the so-called “less lethal” munitions at a student from less than five 9 feet away.

10

83. Police violently arrested marchers and walked them into Dodd Hall, where they were 11

detained, seated in zip ties against the wall.

12

### **JURISDICTION AND VENUE**

13

84. Jurisdiction is proper under Article VI, § 10 of the California Constitution and under 14 Code of Civil Procedure sections 410, 526, 526a, and 1060.

15

85. Venue is proper in this Court pursuant to Code of Civil Procedure §§ 393 and 395 16 because the conduct complained of occurred in Los Angeles, and this action proceeds against public 17

officers in Los Angeles for actions taken “in virtue of [their] office.” Code Civ. Proc. § 393(b). The 18

relief sought is within this Court’s power to grant.

19

### **PARTIES**

20

### **THE PLAINTIFFS**

21

86. The Plaintiffs are thirty-five people who were devastated by Israel’s genocidal 22

attacks on Palestine, UCLA's blanket support for them, and UCLA's investment in companies that 23

profit from mass death and human suffering. They believe in Palestine's right to self-determination, 24

they want an end to the genocide in Palestine, they want UCLA to divest from companies profiting 25

from it, and they want their freedom of expression to be respected.

26

87. The Plaintiffs were on UCLA's campus between April 30 and May 2, 2024, or June 27

10, 2024. They are students and faculty at UCLA, legal observers, journalists, and concerned 28

- 21 -

## COMPLAINT

1

citizens. They are Jewish, Muslim, Christian, atheist, and agnostic. They are Black, white, 2  
Palestinian, Arab, South and East Asian, and Latin American.

3

88. All Plaintiffs bring this suit in their individual capacities for injunctive, declaratory, 4  
and monetary relief against the Defendants.

5

89. All Plaintiffs have either complied or substantially complied with the Government 6

Claims filing requirements and have administratively exhausted their ability to seek remedies 7

against the California Highway Patrol and the City of Los Angeles.

8

**Thistle Boosinger**

9

90. Plaintiff Thistle Boosinger is a pro-Palestinian protester. At all relevant times, she 10  
was a resident of Los Angeles County.

11

91. Before the violent mob attack on the encampment, Thistle was a Taiko drum 12  
musician and taught drumming in music classes and an afterschool program.

13

92. Thistle frequently visited UCLA's campus, enjoying time with her friends and fellow 14  
musicians. Before April 30, 2024, Thistle's social community revolved in large part around  
her 15  
drum group, with which she practiced three to four days a week.

16

93. On April 30, 2024, Thistle was helping to distribute masks and other gear at the 17  
Palestine Solidarity Encampment when a group of mob members tried to dismantle the 18  
encampment's protective structures.

19

94. Thistle reached between the plywood boards and grabbed the metal bike rack  
UCLA 20

staff had placed around the perimeter of the encampment. As she reached out her hand,  
members of 21

the mob incited other attackers, yelling, "Hit their hands! Hit their hands!!" A member of  
the mob 22

hit Thistle's hand repeatedly with a metal rod so hard that it shattered her hand and severed  
a nerve 23

in her ring finger.

24

95. Thistle was in excruciating pain that night and for many days thereafter. She has had 25  
three painful and unsuccessful surgeries on her hand.

26

96. Thistle has ongoing pain as well as reduced mobility and strength in her hand. After 27 each of her three surgeries, Thistle has lost income due to her inability to use her hand. She has not 28

- 22 -

## COMPLAINT

1

been able to play the drums ever since. She can no longer teach music and has been forced to 2

attempt other employment due to her injuries.

3

97. Thistle continues to suffer psychologically, financially, and emotionally to the 4 present day.

5

## **Roe 1**

6

98. Roe 1 is a Palestinian with family in Palestine. During her time at UCLA, Roe 1 was 7 a member of Students for Justice in Palestine, the Middle Eastern Student Association, the Muslim 8

Student Association, and the Psi Chi International Honors Society in Psychology. At all relevant 9

times, Roe 1 was a student at UCLA.

10

99. Roe 1 is the victim of multiple incidents of racist and anti-Palestinian harassment at 11 UCLA because she is Palestinian, including an incident when she was attacked while she was 12

selling keffiyehs. Despite making a formal complaint about this attack, Roe 1 never received an 13

update on this investigation or any other investigation from UCLA.

14

100. Roe 1 was present in the encampment for several days before the mob attacked on 15

April 30, 2024. She saw the evolution of this group from a somewhat small throng of Zionist 16

counter protesters shouting vulgar, racist, and sexualized insults and threats into a massive, 17

overwhelmingly violent, unhinged mob on April 30.

18

101. On April 27, they called her a “baby killer” and a “terrorist” and asked her if she 19 would care if she were raped. On April 28, their threats escalated into physical violence, causing 20

Roe 1 to collapse in a panic attack. On April 29, a group of Zionists surrounded and threatened her, 21

swinging so close to her face that she had another panic attack because of the assault. Roe 1 had 22

multiple panic attacks during this time, whether at the encampment or away from it, due to the 23

menace of this escalating group of counter protesters.

24

102. On the night of April 30, mob members sprayed her with chemical munitions. Her 25 eyes burned as if on fire, and she fell to the ground in immense pain, hyperventilating. Roe 1 felt 26

like she would never be able to open her eyes. At that moment, the mob started attacking the 27

encampment with fireworks. Roe 1 could not see and had to be taken to the encampment’s medical 28

tent.

## COMPLAINT

1

103. The mob's chemical munition and firework attack was highly traumatizing. The mob 2  
attack reminded her of scenes she was familiar with from growing up Palestinian—scenes  
of illegal 3

Zionist settlers storming the homes of Palestinians while the Israeli military stood by and  
watched 4

or even facilitated. The mob attackers used the same tactics at UCLA she had seen in  
Palestine. 5

104. Roe 1 was also present on June 10, 2024, for an anti-genocide protest on UCLA's 6  
campus. Police responded violently, arresting peaceful protesters, kettling them, and  
shooting 7

protesters with kinetic impact projectiles.

8

105. Without warning, UCPD officers swarmed Roe 1, lifting her into the air and 9  
slamming her violently into the ground. She screamed in terror. As three large police  
officers kept 10

forcibly shoving her to the ground, she was confused, disoriented, and in serious pain.  
Despite not 11

being able to move, the officers kept screaming at her, "Stop resisting!" as they zip-tied  
her. 12

106. As police pulled her up off the ground, Roe 1 tried to speak, but police shoved her  
so 13

hard that her head whiplashed forward in extreme pain. She collapsed from the beating,  
leaving 14

police to carry her limp, folded body up the stairs. Two officers then pushed her up against  
a wall. 15

107. Police would not say why she was detained. She demanded access to a lawyer. 16

Police further tightened her zip-ties until her wrists bled. A female officer told her that she would be 17

released if she just provided her name. After she had given her name, a Lieutenant arrived and told 18

her she would be taken to the police station.

19

108. Police refused to say why she was arrested and locked Roe 1 in a room for around an 20

hour where she was taunted by officers who had previously refused to investigate claims she made. 21

109. She sustained bruises requiring medical treatment as a result of being violently 22 thrown to the ground and psychological and emotional to this day.

23

110. Roe 1 continues to suffer psychologically and emotionally to this day, including 24 suffering from panic attacks.

25

## **Roe 2**

26

111. Plaintiff Roe 2 is a pro-Palestinian protester who works as a schoolteacher in Los 27 Angeles. He was a lifeguard and had first aid training. At all relevant times, he was a resident of 28

Los Angeles County.

- 24 -

## **COMPLAINT**

1

112. Roe 2 was appalled by footage of the mob attack on April 30 and, given his first aid 2 knowledge and CPR training, thought he could help people if there were further mob attacks. 3

113. Roe 2 came to the encampment the night of May 1 and was present the police arrived 4

and stormed it, pointing rifles at his face and those around him, terrifying everyone. 5

114. Later police stormed the plywood enclosure the encampment members had erected to 6

protect themselves from the mob assaults. Roe 2 saw the explosions from percussion grenades as 7

they were going off over his head.

8

115. The police, wielding long guns, shot several people in front of Roe 2. Roe 2 was 9

doing nothing to threaten anyone, and the police had no reason to think otherwise. Despite this, an 10

officer aimed what looked like a shotgun directly at him and shot him in the chest. He fell to the 11

ground in pain, watching others get shot while percussion grenades exploded overhead. 12

116. Roe 2's pain, already excruciating, became even more unbearable throughout the 13 night.

14

117. Roe 2 suffered a fractured sternum and a pulmonary contusion. In addition to his 15 physical injuries, Roe 2 continues to suffer psychologically and emotionally to the present day. 16

### **Faraaz Qureshi**

17

118. Faraaz Qureshi, a student and activist, was a peaceful participant in a protest at 18 UCLA on the night of May 1st, 2024, and the early hours of May 2nd, 2024, when the police raided 19

the Palestine Solidarity Encampment.



20

119. At approximately 4:35 a.m., Qureshi was shot four times—once in the right pinky 21  
finger, twice in the chest, and once in the back. The impact of the rubber bullet on his finger  
caused 22

a severe open fracture, breaking the bone into three pieces, dislocating the finger, and  
causing 23

extensive soft tissue damage. His skin was torn open, exposing bone, and he experienced  
immediate 24

and intense pain. His finger quickly began to turn blue, indicating possible vascular  
compromise. 25

The other rounds left contusions and abrasions on his chest and back, causing additional  
pain and 26

bruising.

27

120. Due to the police barricades preventing emergency medical personnel from  
entering 28

the protest area, Qureshi had to be evacuated by fellow protesters. He and his friends  
navigated

- 25 -

## COMPLAINT

1

through bushes, fences, and infrastructure to reach a waiting car, which transported him to  
the 2

emergency room.

3

121. Upon arrival, doctors initially considered amputating his finger due to the severity of 4  
the injury. However, after extensive examination, he underwent a surgical procedure to  
clean and 5

stabilize the wound. He was treated with IV morphine for pain management and prescribed 6

antibiotics to prevent infection.

7

122. As of his most recent medical evaluation, Qureshi continues to experience significant 8

pain and limited mobility in his finger. He has undergone follow-up appointments with orthopedic 9

specialists and faces the possibility of additional surgeries to restore function to his hand. His 10

injuries have directly impacted his ability to perform daily tasks, and he remains unable to work 11

since the date of the incident.

12

123. Beyond the physical injuries, Qureshi has suffered severe emotional distress. The 13  
trauma of witnessing police brutality, coupled with the pain and uncertainty surrounding his 14

recovery, has left him struggling with anxiety and psychological distress. He has also experienced 15

significant disruption to his personal and academic life.

16

### **Jakob Johnson**

17

124. Jakob Johnson is a 2024 graduate of UCLA. During his time at UCLA, he worked at 18  
the school library. At all relevant times, she was a resident of Los Angeles County. 19

125. On June 10, 2024, Jakob joined other students and faculty on campus to bear witness 20

to over 46,000 Palestinians who had been martyred or buried under the rubble by Israel's genocidal 21

assault on Gaza.

22

126. The peaceful protesters' funeral march was eventually marshaled by police into a 23 narrow courtyard between two buildings, trapping them there with no way to leave. Jakob and 24

others tried to leave, but they were blocked by police at the south side of the courtyard. As Jakob 25

was trying to find an exit, police quickly advanced on him and others. All of a sudden, Jakob saw a 26

group of UCPD officers violently throw a young woman to the ground just feet away from him, 27

holding her up by her hands while beating her.

28

- 26 -

## COMPLAINT

1

127. As Jakob pleaded with the police to stop beating her, the police continued to 2 advance, and Jakob noticed one brandishing a gun.

3

128. The police that were advancing continued to yell, "Move back!" while the police 4 behind Jakob and the crowd prevented them from moving anywhere. As the police kettled Jakob 5

and the others, Jakob held both of his hands up in the air and pleaded for the police to stop 6

advancing and to let them leave and disperse safely.

7

129. Jakob was doing nothing to threaten anyone, and the police had no reason to think 8

otherwise. He watched in terror for some twenty seconds as an officer lined up a shot, pointing his 9

weapon directly at his chest. The officer shot Jakob from less than ten feet away. The rubber bullet 10

knocked Jakob to the ground where he was nearly trampled because of the police charge on the 11

trapped crowd. He panicked and went into shock. He felt like he might die right there. 12

130. Although a volunteer medic who was present warned the police that Jakob needed 13 urgent medical attention, the police continued to crush the crowd into a small area, knocking Jakob 14

back down onto the ground twice more.

15

131. After Jakob was carried to safety away from further police attacks volunteer medics 16

cleaned Jakob's wound and told him to go to the emergency room immediately. At the hospital 17

emergency room, Jakob was coughing up blood and was hospitalized.

18

132. The so-called "less lethal munition" injured Jakob's heart and lungs and caused an 19 entry wound that did not heal for weeks and permanently scarred him.

20

133. Although Jakob experienced severe depression, UCLA refused him access to the free 21

UCLA Counseling and Psychological Services offered to students.

22

134. Although Jakob had been admitted to law school, in August of 2024, two weeks 23 before classes started, Jakob had to withdraw as he was still reeling from the aftermath of being shot 24

by police.

25

135. In October of 2024, Jewish Voice for Peace organized an on-campus event to 26  
observe the Jewish holiday of Sukkot. Jakob was present when a phalanx of UCPD officers  
in full 27

riot gear charged them, triggering an episode so severe that Jakob had trouble breathing.  
He 28

continues to suffer psychologically and emotionally to this day.

- 27 -

## COMPLAINT

1

### **Jack Kearns**

2

136. Jack Kearns is a 2024 graduate of UCLA where he obtained a Master of Public 3  
Policy. Jack was present in the encampment from the day it was established and was there  
regularly 4

between April 25 and May 2. At all relevant times, he was a resident of Los Angeles County.  
5

137. On the night of April 30, Jack started a shift as part of the safety team at the 6  
encampment at 9:00 PM. While things were calm initially, the mob started assembling  
outside the 7

encampment at around 10:30 PM, playing loud music, and insulting him and people. 8

138. Jack was on the front lines when the mob launched fireworks into the Palestine 9  
Solidarity Encampment and he was sprayed with chemical munitions by the mob. The mob  
began to 10

violently attack the encampment around midnight.

11

139. Shortly after seeing another pro-Palestinian protester being assaulted, Jack tried to 12

pull him to safety. As he reached his arms around the other protester, a member of the mob hit Jack 13

in the head with a large piece of wood. Jack fell to the ground, lost consciousness, and was treated 14

by medics. He struggled to stand up, was woozy, and had a hard time seeing.

15

140. While waiting at the medic tent, he saw the other pro-Palestinian protester who had 16

been beaten by the mob walking up, covered in blood.

17

141. A fellow protester told Jack he needed to go to the hospital for his head wound. Jack 18

went to a hospital for treatment for his head wound and concussion. After a CT scan and 19

examination, Jack was diagnosed with a concussion. Doctors told Jack he should have an MRI, 20

which he did thereafter.

21

142. Jack experienced pain, dizziness, and constant headaches for weeks after the brutal 22

attack forcing him to miss work and valuable time in the classroom.

23

### **Afnan Khawaja**

24

143. Plaintiff Afnan Khawaja was a fourth-year computer science student at UCLA at the 25

time of the attack. At all relevant times, he was a resident of California.

26

144. On May 1, 2024, on the UCLA Campus, a violent mob punched and kicked Afnan in 27

the face multiple times while Afnan attempted to rescue another student from the mob, causing cuts 28

to Afnan's lip.

- 28 -

## COMPLAINT

1

145. Shortly after the mob attacked Afnan without provocation, Afnan retreated behind a 2  
barricade, but the mob sprayed a chemical munition and temporarily blinded Afnan  
multiple times, 3

leaving residual pain and burning in Afnan's hands and face.

4

146. Minutes later, the mob then dismantled the barricade, and as Afnan tried to recover  
a 5

piece of the barricade to protect the defenseless students that were being attacked by the  
violent 6

mob, Defendant Edan On blasted Afnan on the head with a wooden rod, concussing and  
injuring 7

Afnan.

8

147. As a direct and proximate result of the attack and Defendants' reckless and  
negligent 9

conduct, Afnan suffered multiple injuries and damages, the exact amount of which will  
be 10

determined according to proof at trial.

11

## **Dolores Quintana**

12

148. Plaintiff Dolores Quintana is a journalist and the editor of the Century City 13  
Westwood News. At all relevant times, she was a resident of Los Angeles County. 14

149. By the time Dolores arrived to cover the April 30 rioters attacking the  
encampment, 15

she was already known to them because of her earlier newsgathering. On April 25 she  
witnessed 16

members of the mob trying to infiltrate the encampment and provoke encampment  
members, 17

yelling “If you touch us we’ll beat your ass!”. Encampment members calmly formed a  
nonviolent 18

human line to protect the encampment and de-escalate the situation until the mob  
members left. On 19

April 28, a counter protester tore down a pro-Palestinian sign and threw it at Dolores,  
hitting her in 20

the head while nearby UCLA private security never intervened.

21

150. The mob accosted Dolores upon her arrival on April 30, aggressively approaching 22  
her in such a threatening manner that she fell while backpedaling. As she gathered herself  
to stand, 23

mob member Edan On, wearing a terrifying white mask, menacingly got within an inch of  
her face. 24

151. As On approached her, another member of the mob threatened Dolores, wielding  
a 25

large chunk of wood just inches from her face. Another member of the mob then shouted in  
her face 26

with a megaphone and shined a bright LED light in her eyes, blinding her.

27



152. As Dolores continued to film, Edan On came up behind her and threatened her with a 28

long white pole.

- 29 -

## COMPLAINT

1

153. Dolores also filmed another member of the mob named Eyal Shalom spraying 2  
chemical munitions at a pro-Palestinian protester. As Dolores moved backward to escape the cloud 3

of chemical munition Eyal Shalom ran into her. Another member of the mob yelled “Fuck you!” at 4

Dolores and slapped her hand causing her phone to fly several feet away to the ground. 5

154. Around 1:00 AM, Dolores spotted Eyal Shalom moving towards her. Before she 6  
could react, a second mob member coordinated with Shalom to distract Dolores by blinding her 7

with a bright light. While she was blinded by the light one attacker shined in her eyes, Shalom 8

sprayed chemical munitions directly into Dolores’ face and eyes at point-blank range. The chemical 9

spray blinded her left eye, and caused excruciating pain, burning her eye and her face. 10

155. Her face was burning, and she could barely breathe. She could not see out of her left 11

eye, and her right eye began to burn and get blurry. As Dolores tried to get away, she heard fellow 12

reporter Catherine Hamilton’s blood-curdling scream from being sprayed with chemical munitions. 13

## Catherine Hamilton

14

156. Catherine Hamilton is a fourth-year undergraduate student at UCLA, majoring in 15

gender studies and political science with a minor in professional writing. She is currently a Board 16

Member and Executive Committee Member of the UCLA Communications Board.  
Catherine is also 17

the Editor in Chief of the UCLA Undergraduate Law Journal, where she previously served as the 18

Managing Editor, Executive Articles Editor, and Editor since 2021. She also served as the News 19

Editor for the Daily Bruin student newspaper for the 2023-2024 academic year and previously held 20

roles as the National News and Higher Education Assistant Editor and Contributor at the paper. At 21

all relevant times, she was a resident of Los Angeles County.

22

157. On Saturday evening, April 27, 2024, Catherine arrived on campus at approximately 23

11:00 PM in her role as a journalist and photographer. Nouri Mehdizadeh---one of the Zionist 24

counter protesters who was present regularly at the encampment---approached Catherine with a 25

group of around ten other people, threatening and assaulting her. Mehdizadeh repeatedly cursed her 26

and took pictures of her press credentials which contained personal identifying information. 27

158. Mehdizadeh grabbed Catherine and struck her. Other mob members shined bright 28  
lights directly into her eyes. UCLA private security who witnessed this from nearby did nothing.

- 30 -

COMPLAINT

1

159. On April 28, 2024, counter protesters, escalating the violence that would eventually lead to the mob attack a few days later, assaulted, harassed, and threatened Catherine while she was

newsgathering. UCLA private security again refused to intervene, saying she had put herself at risk

by coming to do her job.

5

160. On April 30, 2024, Catherine again returned to cover the encampment. In response to

the increasing harassment and assaults on the media, UCLA Media Relations had previously

promised and granted all student reporters from The Daily Bruin 24-hour access to Haines Hall for

their safety. When Catherine tried to enter the building UCLA's private security denied her access.

161. Catherine called UCLA Media Relations to notify them that UCLA's private security had kept her from entering Haines Hall. She warned that she was concerned for her safety as she

had been attacked multiple times, and the mob was growing increasingly violent. Despite her

repeated calls to UCLA Media Relations over three hours, she was never allowed into the building.

162. The mob repeatedly struck Catherine and sprayed her and her reporter colleagues with painful chemical munitions. They also shot fireworks and other incendiaries into the Palestine

Solidarity Encampment, burning Catherine's hand and making her fear for her life.

163. Mehdizadeh followed Catherine around the perimeter of the Palestinian Solidarity Encampment, yelling at her and terrifying her, coordinating his assaults with other mob members.

164. Just after midnight on April 30, Mehdizadeh and other mob members coordinated to 19

physically assault Catherine and her Daily Bruin colleagues. The mob coordinated with Mehdizadeh 20

to block Catherine and her colleagues' path by forming a human wall with outstretched arms, 21

preventing them from moving forward. Suddenly, the mob sprayed an unknown chemical munition 22

directly into Catherine's eyes, causing immense pain and significantly impairing her vision. 23

165. A member of the mob also hit Catherine hard in the chest and knocked one of her 24 colleagues to the ground while screaming racial epithets. As Catherine and her colleagues screamed 25

in pain, nearby UCLA private security did nothing.

26

166. Upon being attacked by Mehdizadeh and the mob, Catherine felt like she was having 27

a panic attack. The pain in her sternum was so intense that she could not stand up. Catherine also 28

could not see anything, and her eyes were in excruciating pain. She asked UCLA private security if

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## COMPLAINT

1

they could help her with water for her eyes and if they could help her and her colleagues safely get 2

back to the Daily Bruin office. UCLA private security refused.

3

167. As a result of these attacks, Catherine required hospital treatment and her eyes 4

burned for several days afterward. Similarly, the pain in Catherine's sternum continued for several 5

days, making it hard to even sit up.

6

168. Catherine continues to suffer psychologically and emotionally to this day. She truly 7  
believed the mob was going to kill someone that night. She barely goes to campus and  
minimizes 8

her time there.

9

### **Roe 8**

10

169. Plaintiff Roe 8 is a pro-Palestinian protester and a 3rd year undergraduate student  
at 11

UCLA who works for the UCLA Library. At all relevant times, they were a resident of Los  
Angeles 12

County.

13

170. At approximately 8:00 PM on April 25, Roe 8 was at the Palestine Solidarity 14

Encampment, when an older man carrying a large Israeli flag approached them with a  
group from 15

the Zionist counter protesters. The group was yelling at and threatening the encampment  
members 16

when the older man with the flag shoved Roe 8 off the ledge onto the ground and kicked  
Roe 8. 17

Nearby UCLA private security guards did nothing to prevent the attack or help Roe 8. 18

171. As the counter protesters who would later attack the encampment en masse on  
April 19

30 became more aggressive and violent, they sexually harassed and physically threatened  
Roe 8. 20

Early one morning while it was still dark, Roe 8 was standing watch at the edge of the encampment 21

when another older man rode his bicycle toward them, threatening to run Roe 8 over and saying he 22

hoped Roe 8 would be raped.

23

172. Roe 8 was present early in the morning of May 2 when police violently attacked the 24 encampment. Police struck Roe with a baton multiple times as they kettled Roe 8 and others. 25

173. Roe 8, who was wearing a keffiyeh, was not threatening anyone and had been 26 completely nonviolent. Despite this, an officer violently grabbed Roe 8 from behind and slammed 27

them to the ground. Multiple officers piled on top, and one shoved Roe 8's face down so hard that it 28

split open their nose. While their nose was bleeding, and their mouth was filled with dirt an officer

- 32 -

## COMPLAINT

1

kneeled on Roe 8's neck and shoulders while another tied zip-ties, so tightly that Roe 8 lost feeling 2

in their fingers, and their hands turned purple.

3

174. While Roe 8 was still bleeding, in pain, and losing circulation in their hands, a male 4 officer unzipped Roe 8's sweatshirt and physically searched them. Instead of a pat-down for 5

weapons, the officer probed deeply, and for quite a long time, into Roe 8's pant pockets. The grope 6

like “search” was so deep and so prolonged that Roe 8 felt extremely uncomfortable and sexually 7

violated. Roe 8 had no weapons.

8

175. Roe 8 remained on a curb for about an hour, asking one officer with a pair of scissors 9

if he could loosen the zip-ties because Roe 8 was in immense pain. The officer said he could not do 10

anything about it, had no way of cutting them off, and refused to get someone else to help Roe 8. 11

176. A female officer eventually came to confiscate the rest of Roe 8’s belongings. While 12

attempting to remove a ring from Roe 8’s finger, the female officer noticed that their fingers were 13

purple and so swollen that she could not remove Roe 8’s ring. The female officer immediately 14

asked another officer to replace Roe 8’s zip ties with a less harmful pair.

15

177. Throughout the hours-long detention Roe 8 was never allowed to use the restroom or 16

given water.

17

178. In addition to suffering a cut and battered face, Roe 8 suffered painful bruises on her 18

torso, arms, and legs that lasted for many days.

19

179. Roe 8 continues to suffer psychologically and emotionally to this day.

20

**Shandra Campbell**

21

180. Plaintiff Shandra Campbell is a pro-Palestinian protester. She is a member of 22  
CodePink, a feminist grassroots organization working to end U.S. warfare and imperialism,  
support 23  
peace and human rights initiatives, and redirect resources into healthcare, education,  
green jobs, and 24  
other life-affirming programs.

25

181. On April 30, 2024, the mob attacked Shandra with chemical munitions, causing  
her 26

chest and eyes to start burning and then to cough and gag due to her asthma.

27

182. After going to her car to get a mask and goggles for protection, she returned to the 28  
encampment to help administer first aid, staying as far from the attackers as possible. She  
felt like

- 33 -

## COMPLAINT

1

she was in a war zone, but stayed both to render aid and because it was too dangerous to  
leave until 2

the rioting mob left.

3

183. On the night of the protest on June 10, 2024, A UCPD Lieutenant sexually assaulted 4  
Shandra, grabbing and groping her breasts under the pretext of detaining her. Shandra had  
no 5

weapons and did not pose a threat to the officer or anyone else. There was no  
reasonable 6

justification for the Lieutenant to grab her in a sexually assaultive manner.



7

184. Shandra continues to suffer psychologically and emotionally to the present day. 8

**Roe 6**

9

185. Plaintiff Roe 6 is a pro-Palestinian protester. She is a vocalist, songwriter, music 10  
producer, and educator. At all relevant times, she was a resident of Los Angeles County. 11

186. On the night of April 29 after 10:00 PM, Roe 6 went to the outer edge of the safety 12  
perimeter. Counter protesters, escalating their violence in a ramp-up to their April 30  
attack, 13

threatened her and threw water bottles at her.

14

187. On the night of April 30, Roe 6 was present when the mob assembled. Around  
11:00 15

PM, they started shooting fireworks into the encampment, one exploding next to her. 16

188. The mob assaulted Roe 6 with chemical munitions twice. The spray was all around 17  
the air, making it hard to breathe. This was terrifying as she could not see, was in extreme  
pain, and 18

struggled to breathe. The chemicals spread all over her hair, skin, and hands. No matter  
how many 19

times she washed her hands, they wouldn't stop burning, and it was extremely painful. 20

189. A mob member threw a projectile, which struck her left eye, causing excruciating 21  
pain. Roe 6 collapsed and was screaming. She was unable to see out of her eye for around  
twenty 22

minutes and got a black eye. Someone from the camp assisted her and took her to their  
medical tent, 23

where she got some ice.

24

190. Out of concern that the authorities were not protecting the encampment from violent 25

attacks, Roe 6 remained present on May 1. Roe 6 was unable to get any rest due to the burning and 26

pain from the macing. She went to the medical tent in the morning and had her hands wrapped up. 27

Her hands burned the entirety of May 1.

28

- 34 -

## COMPLAINT

1

191. In the early hours of the morning on May 2, police shot flash bangs and rubber 2  
bullets.

3

192. Roe 6 saw the police hitting people with batons. There was a professor next to Roe 6, 4

who was screaming, identifying herself as a professor. This same officer then grabbed Roe 6 by the 5

collar of her jacket and dragged her down to the ground.

6

193. Police then zip-tied Roe 6 and was detained for hours. During this time, Roe 6 was 7  
denied medical treatment for over eight hours, despite numerous requests. She told the police her 8

hands were burning, showed them the wrappings, and repeatedly asked for a medic, but the police 9

denied her requests. They kept telling her she would be treated later.

10

194. When Roe 6 eventually was treated hours later, she had developed a severe reaction 11

from the chemical munitions and fireworks.

12

195. Police patted Roe 6 down several times. She had a menstrual pad on and was 13 repeatedly rubbed in her vaginal area. Once before going on the bus, once after getting off the bus, 14

and once before being booked by another female officer. She was patted down yet again by that 15

same officer.

16

196. After her release, Roe 6 sought medical treatment for her eye.

17

197. Roe 6 experiences ongoing blurriness in her left eye. In addition to her physical 18 injuries, Roe 6 continues to suffer psychologically and emotionally to the present day. 19

### **Angelica Jit**

20

198. Plaintiff Angelica Jit was a community member supporting student protesters at the 21

at the time of the attack. At all relevant times, she was a resident of California.

22

199. On May 1, 2024, on the UCLA Campus, upon information and belief, Defendant 23 Eliran Bismut or another assailant blasted Angelica in the head with a 2 X 4 wooden plank. 24

200. The blow to the head caused Angelica to suffer a concussion.

25

201. As a direct and proximate result of the attack and the Defendants' reckless and 26

negligent conduct, Angelica suffers from physical injuries, PTSD, and damages, the exact amount 27

of which is to be determined according to proof at trial.

28

- 35 -

## COMPLAINT

1

202. On May 1, 2024, on the UCLA Campus, upon information and belief, Defendant 2  
Eliran Bismut or another assailant blasted Angelica in the head with a 2 X 4 wooden  
plank. 3

203. The blow to the head caused Angelica to suffer a concussion.

4

204. As a direct and proximate result of the attack and the Defendants' reckless and 5  
negligent conduct, Angelica suffers from physical injuries, PTSD, and damages, the exact  
amount 6

of which is to be determined according to proof at trial.

7

## **Roe 15**

8

205. Plaintiff Roe 15 was a community member protecting student protesters from the 9  
violent mob at the time of the attack. At all relevant times, he was a resident of  
California. 10

206. On May 1, 2024, on the UCLA Campus, a violent mob surrounded Roe 15 and 11  
began attacking him from every direction.

12

207. The violent mob threw an object that struck Roe 15 in the face, punched Roe 15,  
and 13

sprayed him with a chemical munition.

14

208. Roe 15 suffered a black eye, jaw pain, a swollen nose, and eye pain, all of which 15 took at least two weeks to heal.

16

209. As a direct and proximate result of the attack and Defendants' reckless and negligent 17

conduct, Roe 15 suffers from physical injuries and damages, the exact amount of which will be 18

determined according to proof at trial.

19

## **Roe 9**

20

210. Roe 9 is a graduate student at UCLA, pursuing joint degrees in public health and 21 social welfare. She has organized with Jewish Voice for Peace and is a member of Graduate 22

Students for Justice in Palestine. Roe 9 has engaged in the movement for justice in Palestine for 23

around five years. Roe 9 suffered numerous injuries as a result of UCLA's failure to protect its 24

students against the mob and the police. At all relevant times, she was a resident of Los Angeles 25

County.

26

211. Roe 9 broke down into tears several times at the encampment. Escalating threats of 27

sexual violence from the counter protesters who would later become a violent mob and the images 28

on the jumbotron increased her fear and apprehension.

- 36 -

## COMPLAINT

1

212. She believed the threat was real and that UCLA would do nothing to protect them, 2  
even against bomb threats.

3

213. Roe 9 left the encampment to alert UCLA that “something horrible was going to 4  
happen. It’s not a question of if; it’s a question of when.” Fifteen minutes later, Roe 9  
received news 5

via text message that the mob was violently attacking the encampment.

6

214. Roe 9 arrived at the encampment on April 30 at approximately 11:15 PM. The 7  
experience was “madness.” People were terrified, and the mob caused chaos.

8

215. The mob attacked Roe 9 with chemical munitions repeatedly that night, causing her 9  
to gag and vomit. Her eyes were red, her skin felt like it was burning, and she was in  
significant 10

pain. The effects lasted well into the next day.

11

216. The entire experience was traumatizing. Watching the mob attack and injure her 12  
friends and colleagues and the violent images and sounds haunt her to this day. 13

217. On May 1 and 2, 2024, Roe 9 was present when police raided the encampment  
and 14

violently attacked students and faculty, among other protesters. Roe 9 was terrified as  
police threw 15

flashbangs into the encampment.

16

218. An officer stood over Roe 9 and aimed his weapon down at her face, threatening to 17  
shoot her from less than 2 feet away. She was terrified.

18

219. Police then kettled Roe 9 against a wall with other protesters as police kept 19  
advancing, yelling, "Move back!" Roe 9 was at the back of the group, and there was no  
place for 20

Roe 9 to go. As she pressed herself against the wall, she feared she was going to be  
crushed as 21

police pressed the crowd tighter and tighter against her. Police arrested and zip-tied Roe 9,  
injuring 22

her in the process.

23

220. When Roe 9 was finally released from the jail hours later, around 8:30 AM, she was 24  
reduced to tears, sobbing uncontrollably. Roe 9 continues to suffer psychologically and  
emotionally 25

from the mob attack and police raid.

26

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27

//

28

//

- 37 -

COMPLAINT

1

**Roe 10**

2

221. Roe 10 is a PhD candidate at UCLA. He is also a Teaching Fellow, an awarded 3 teacher, and a member of the Graduate Student Union. Roe 10 earned his B.S. in physics from the 4

UC system. At all relevant times, he was a resident of Los Angeles County.

5

222. Roe 10 was present at the encampment from April 25 until May 2 and served as a 6 member of the safety team.

7

223. On April 27, 2024, Roe 10 observed a member of the group gathering outside the 8 encampment that would eventually escalate into a mob threatening to set the encampment on fire. 9

Later that evening, a crowd of 30-50 attempted to break into the encampment. After things de 10

escalated, they retreated to the Royce steps, where they continued blasting noise at the encampment 11

into the late evening.

12

224. Around noon on April 28, 2024, a small group counter protesters attacked Roe 10 as 13

part of the escalation that eventually grew into a much larger, coordinated, violent attack on April 14

30. His attacker jumped on Roe 10's back, spun around, and then punched Roe 10 in the face. The 15

group coordinated to help the lead attacker escape.

16

225. Roe 10 suffered a concussion as a result. He had headaches and trouble focusing for 17



over 24 hours.

18

226. While on the encampment's safety team that same day, Roe 10 was attacked again, 19

having his arm wrenched behind his back in a painful position.

20

227. On the evening of April 30 into the morning of May 1, 2024, Roe 10 was present 21 while the mob, now at full strength, attacked the encampment. Throughout the attack, the mob 22

sprayed Roe 10 with chemical munitions many times, causing Roe 10 intense pain and nonstop 23

coughing. Members of the mob pointed a laser pointer into Roe 10's eyes, temporarily blinding 24

him.

25

228. Roe 10 asked UCLA private security posted nearby if they were going to do 26

anything to protect the encampment against the mob's attack, but the UCLA private security guards 27

ignored him and his pleas for help. Roe 10 was terrified knowing that neither police nor UCLA 28

private security would do anything to help pro-Palestine protesters.

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## COMPLAINT

1

229. No one stopped the attackers.

2

230. Later during the day on May 1, Roe 10 again approached UCLA private security to 3

ask them if they were going to intervene as more mob members assembled outside the encampment. 4

UCLA private security laughed at him, ignoring his concerns, despite the mob's violent attack the 5

night before.

6

231. When the police raided the encampment on the morning of May 2, 2024, Roe 10 was 7

doing nothing to threaten anyone, and the police had no reason to think otherwise. Despite this, a 8

police officer hit Roe 10 with open-palm strikes to Roe 10's face and neck, knocking off Roe 10's 9

glasses and causing his throat to clamp shut, making it difficult to breathe. The police officer then 10

grabbed Roe 10's climbing helmet, pulled it down over Roe 10's neck, and dragged Roe 10 to the 11

ground, strangling Roe 10 with the helmet's strap. Roe 10 screamed in pain and worried that he was 12

about to pass out.

13

232. When the police officer stopped strangling him, Roe 10 was lying on the ground in a 14

daze. While on the ground, an officer forced Roe 10's arms behind his back in a painful position 15

and pressed a knee into Roe 10's upper back, causing Roe 10's lungs to feel compressed and 16

making it even more difficult to breathe. When Roe 10 told the officer that he was having trouble 17

breathing, the police officer dismissed him. Police then zip-tied Roe 10 so tightly that it left painful 18

marks on his wrists even after the zip-ties were removed. Police refused to help Roe 10 recover his 19

glasses so he could see.

20

233. Roe 10's shoulders were in immense pain his throat painfully swelled shut, and he 21 lost the ability to speak or whisper. Roe 10 could only mouth words to communicate. 22

234. Eventually, police took Roe 10 to a nurse who failed to conduct a meaningful 23 inspection of Roe 10's injuries, and returned him to the holding cell without treating the swelling in 24

his throat.

25

235. Roe 10 suffered numerous injuries as a result of the police attack and sought medical 26

attention at the hospital. His throat was in pain for several days. Roe 10 also had a large bruise on 27

his leg, and the pain in his leg lasted for three months.

28

236. Roe 10 continues to suffer psychologically and emotionally to this day.

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## COMPLAINT

1

### **Roe 3**

2

237. In 2024, Plaintiff Roe 3 was a UCLA student affiliated with the Graduate Student 3 Union, and Graduate Students for Justice in Palestine. Roe 3 also received his B.S. from UCLA. At 4

all relevant times, he was a resident of Los Angeles County.

5

238. Roe 3 was present at the encampment between April 25 and May 2, 2024. He wore a 6

keffiyeh every day at the encampment until it was lost after being sprayed with chemical munitions. 7

239. On April 28, 2024, Roe 3 attempted to de-escalate tensions and protect a group of 8 pro-Palestinian students near the encampment from an increasingly hostile group of Zionist counter 9

protesters that was gathering. They screamed racist insults at Roe 3, deafened him with bullhorns 10

blasted close to his ears, and shoved him.

11

240. Roe 3 was working safety when the mob arrived on the evening of April 30. The 12 mob shot fireworks and chemical gas into the encampment in a coordinated fashion, blasted music 13

to terrorize them, and wore masks to hide their identity. Roe 3 feared the mob would kill someone 14

that night. A member of the mob sprayed chemical munitions directly into one of his eyes as he 15

tried to stop the mob's attempts to attack the encampment. Roe 3's eye burned intensely. 16

241. Around midnight on April 30, Roe 3 encountered a group of around 30 to 40 mob 17 members attempting to storm into the encampment by force. Fearing for the safety of the 18

encampment, Roe 3 and others rushed over and formed two lines of people to non-violently prevent 19

the mob from entering. The mob threatened Roe 3 with racial slurs and shoving Roe 3. 20

242. Throughout the early morning hours of May 1, multiple smaller groups of the mob 21

threatened and attempted to enter the encampment throughout the night, preventing Roe 3 from 22

getting to sleep until around 6:00 AM.

23

243. Roe 3 was present during the police raid of the encampment on the evening of May 1 24

through the early morning of May 2. When the police arrived, the mob cheered for them and 25

chanted “USA! USA!”

26

244. He was afraid when the police fired numerous flash-bangs at the encampment and 27

saw police point their less-lethal weapons at the crowd and fire into it.

28

- 40 -

## COMPLAINT

1

245. To this day, Roe 3 continues to suffer psychologically and emotionally as a result of 2  
being attacked by the mob and the police.

3

### **Roe 14**

4

246. Plaintiff Roe 14 was a fourth-year Biomedical Engineering student at UCLA at the 5  
time of the attack. At all relevant times, he was a resident of Los Angeles County. 6

247. On May 1, 2024, on the UCLA Campus, Roe 14 was providing volunteer medical 7  
services to student victims of the violent mob attack when a thug donning a black hoodie  
sweatshirt 8

and a red bandana knocked Roe 14 unconscious with two blows to Roe 14's head using a 2 X 4 9

wooden plank.

10

248. Roe 14 remained unconscious for approximately 5 minutes and shortly after 11 regaining consciousness, the violent mob sprayed Roe 14 with a chemical munition, blinding him. 12

Roe 14's head bled profusely and Roe 14's eyes burned.

13

249. Roe 14 was later transferred to the ER with two head contusions. Emergency 14 physicians diagnosed Roe 14 with a concussion.

15

250. As a direct and proximate result of the attack and Defendants' reckless and negligent 16

conduct, Roe 14 suffers from physical injuries, PTSD, and damages, the exact amount of which will 17

be determined according to proof at trial.

18

### **Binyamin Moryosef**

251. Plaintiff Binyamin Moryosef is a 4<sup>th</sup>-year Jewish undergraduate student at UCLA 19

20

and is employed by the university. He is a College Corps Fellow at UCLA and volunteers with 21

826LA, an after-school tutoring and writing program for students ages 6 to 18. At all relevant times, 22

he resided in Los Angeles County.

23

252. As the son of an Israeli immigrant and ethnically Jewish, Binyamin was looking for 24

the chance to act and was moved by the encampment's expression of solidarity with the suffering of 25

the Palestinian people. He was present at the encampment in the days leading up to April 30, 2024. 26

253. On April 30, Binyamin arrived at the encampment around 10:00 PM to volunteer as 27 a member of the safety team. Upon his arrival, Binyamin experienced the mob attacking the 28

- 41 -

## COMPLAINT

1

encampment in a coordinated fashion with fireworks. Benjamin was terrified by the violence of the 2

mob's attack which reminded him of the Israeli military's genocidal attacks in Gaza. 3

254. Binyamin returned to the encampment later in the day on May 1. The experience of 4 being attacked by police flash-bangs was extremely distressing. When police raided the 5 encampment on May 2, they brandished weapons forcefully shoved Binyamin, and made him feel 6

like he was being treated worse than an animal.

7

255. On June 10, 2024, Binyamin joined other students on campus to bear witness to over 8

46,000 Palestinians who had been martyred or buried under the rubble by Israel's genocidal assault 9

on Gaza. Police surrounded the protesters who were shouting "Let us out!" and tried to leave. 10

256. Benjamin was doing nothing to threaten anyone, and the police had no reason to 11 think otherwise. Without giving a notification of dispersal, police physically attacked Binyamin, 12

attempting to wrestle him to the ground. Without giving him any explanation, police violently 13

grabbed Benyamin and zip-tied him, forcing his arm into an excruciatingly painful position and 14

causing him to breathe heavily. The pain was overwhelming and unbearable. Binyamin pleaded 15

multiple times for the police to lessen the strain of the zip-ties that were causing him so much pain, 16

only to be ignored.

17

257. Binyamin continues to suffer psychologically and emotionally to the present day. 18

### **James (Jimi) Peric Degen**

19

258. Plaintiff James Peric Degen (Jimi) graduated from UCLA School of Law in 2024. 20

During law school, he was a member of Law Students for Justice in Palestine, the Labor and 21

Employment Law Association, the National Lawyers Guild, and the Afghan Scholars Humanitarian 22

Parole Project. Jimi co-founded the UCLA chapter of the Peoples Parity Project and, as a student 23

advocate in the International Human Rights Litigation Clinic at the Promise Institute, Jimi assisted 24

Iranian immigrants arbitrarily detained after 9/11. Jimi graduated from West Point in 2012 and 25

served as an officer in the Army for eight years before attending law school. At all relevant times, 26

he was a resident of Los Angeles County.

27

259. During his time serving in the military, Jimi became aware of how the United States 28



government's and other US institutions' blanket support for Israel contributed to the oppression of

- 42 -

## COMPLAINT

1

Palestinians. This awareness motivated him to go to law school to work in human rights and join the 2

movement for justice in Palestine.

3

260. Jimi grew concerned about the escalating violence by the mob and the lack of 4 protection being provided by UCLA and the police. Jimi showed up a little before midnight on 5

April 30 to serve as a volunteer Legal Observer and document the violations of the rights of the 6

encampment members alongside Plaintiff Isabella Lee.

7

261. While documenting the mob attack and the police's and UCLA private security's 8 failures to intervene, one mob member threatened Jimi with a baseball bat or pole-like object. The 9

mob also sprayed Jimi with chemical munitions multiple times. Even though Jimi had undergone 10

tear gas training during his time in the military, the chemical munition caused him immense pain 11

and discomfort, which continued to irritate his ears, nose, throat, and lungs for several days. 12

262. Jimi and Isabella both wore bright green hats identifying themselves as Legal 13

Observers. At one point a mob member pointed at Jimi and Isabella, telling other mob members that 14

the pair was a part of the encampment. As Jimi turned his back on the mob to face the police, 15

someone from the mob threw a metal water bottle striking Jimi in the back of the head, knocking 16

the hat off his head, causing him pain, and leaving him feeling shocked and woozy. 17

263. Moments later a mob member threw another water bottle that struck Isabella in the 18

head. When Isabella turned to ask who had assaulted her, a group of mob members swarmed her. 19

Within seconds, they were surrounded by about a dozen male mob members, many of whom Jimi 20

had witnessed committing acts of violence against the encampment. When Jimi attempted to shield 21

Isabella from the attack, the mob coordinated their attack and started shoving Jimi, pushing him 22

away from Isabella down a hill, calling him a “faggot.”

23

264. When Jimi began to film the mob, one mob member started throwing shadow 24

punches at Jimi, while another snatched Jimi’s phone out of his hand from behind. The mob opened 25

a pathway for the phone thief to slip away, while other mob members grabbed Jimi, preventing him 26

from following the phone thief. One mob member taunted Jimi saying they would give Jimi back 27

his phone when Jimi gave back their “hostages.”

28

- 43 -

COMPLAINT

1

265. UCLA private security did nothing during this attack, refusing to come to his aid 2  
during his assault and robbery.

3

266. Around 3:45 AM on May 1, Jimi observed police in full riot gear push a group of 4  
encampment students back and appear to detain them near the flagpole, where they then  
let the mob 5

scream in the students' faces and threaten them. As the police stood back and laughed,  
Jimi 6

intervened to de-escalate the situation by forming a non-violent human wall between the  
students 7

and the mob. One of the mob members got inches from Jimi's face, threatening and  
screaming at 8

Jimi while the police looked on and again did nothing to intervene. After several minutes of  
this, the 9

police finally allowed the students to leave without explanation.

10

267. Jimi suffered numerous injuries from the mob as well as the police's and UCLA's 11  
failure to protect him.

12

268. Jimi continues to suffer psychologically and emotionally to the present day. 13

### **Isabella Lee**

14

269. Plaintiff Isabella Lee graduated from UCLA School of Law in 2024 where she was a 15  
Leadership Fellow for the People's Parity Project, which she co-founded at UCLA. She was  
also the 16

Co-Chair of the Labor and Economic Justice Clinic, a member of the National Lawyers  
Guild 17

("NLG"), a member of Law Students for Justice in Palestine, a student in the Human Rights 18

Litigation Clinic, and a Senior Editor for the UCLA Law Review. At all relevant times, she resided 19

in Los Angeles County.

20

270. Before law school, Isabella served as an NLG Legal Observer ("Legal Observer") 21 during the movement for George Floyd protests around southern California in the summer of 2020. 22

When the encampment started, Isabella volunteered to serve as a Legal Observer to help ensure the 23

fundamental rights of encampment members to assembly and expression were protected. 24

271. Just after 11:00 AM on April 28, 2024, Isabella observed a man draped in an Israeli 25 flag, hit a pro-Palestinian protester with a large wooden flagpole within eyesight and earshot of 26

UCLA administrators who did nothing to intervene. Shortly thereafter a mob member began 27

screaming in Isabella's face to stop filming, when an older mob member threatened Isabella, saying 28

- 44 -

## COMPLAINT

1

"I'm going to punch you! Believe me!" A concerned pro-Palestinian protester stepped in and de 2

escalated the situation.

3

272. Later on, a different mob member repeatedly thrust her body into Isabella, while 4

screaming at pro-Palestinian protesters through a megaphone. Isabella pleaded with the woman to 5

stop, but she ignored Isabella. After communicating with other Legal Observers, all fearing for their 6

safety, Isabella relocated atop a hill to observe the protest from a distance.

7

273. On April 30, 2024, Isabella arrived at the encampment around 10:00 PM. After 8

observing increasingly threatening behavior from the mob, she entered the encampment to gather 9

information about the threats and slurs yelled by the mob and to wait for her fellow Legal Observer, 10

Plaintiff James (Jimi) Peric Degan, to arrive so she could more safely observe the perimeter in a 11

pair. Suddenly, Isabella heard screaming near the front of the safety barricades and ran to start 12

documenting. As she arrived at the perimeter of the encampment, a member of the mob sprayed 13

Isabella with a chemical munition. Her eyes were stinging and burning intensely. Isabella was 14

choking and coughing uncontrollably. She felt like she couldn't breathe.

15

274. Isabella then saw a flaming projectile fly over her head land inside the encampment 16

and explode. She heard screams and cries for medics as the mob sprayed more chemical munitions. 17

275. When the police arrived, Isabella observed the mob stop their attack for a moment, 18

but when police demonstrated they would not intervene, the mob resumed and doubled-downed on 19

their violent attack. Together Isabella and Jimi documented the mob engaging in multiple assaults 20

on the encampment and its members in the presence of UCLA private security and the police (who 21

were both on the ground and in helicopters). Neither UCLA's private security nor the police took 22

any steps to intervene or stop the violent attack.

23

276. At one point Isabella observed riot police form a line near the flagpole. Mob 24

members who had been violently attacking the encampment began to cheer for the police, chanting 25

"Mission Accomplished!" and "USA! USA!" One leader of the mob proclaimed over the 26 megaphone: "Our job here is done! Let the police finish the job!"

27

277. While documenting this scene, one of the mob members threw a metal water bottle 28

striking Jimi in the head. Moments later, a mob member threw another water bottle striking Isabella

- 45 -

## COMPLAINT

1

in the back of her head, causing her pain. Within seconds a group of hostile mob members then 2

swarmed Isabella and Jimi and began threatening them.

3

278. When the mob separated Isabella from Jimi in a coordinated fashion, she began to 4 panic. Her heart was racing out of control. She felt like she was leaving her body. At that moment, 5

Isabella was terrified that the mob of violent men was going to physically and sexually assault her. 6

As the mob closed in around Isabella and taunted her, Defendant Jared Rubin flashed a strobe light 7

in her eyes, disorienting her, and Defendant Daniel Khalili blasted a megaphone in her ears. 8

Another member of the mob wearing a Dodgers jacket, Rony Abishoor tried to yank Isabella's 9

phone out of her hand and started screaming, "She touched my penis!"

10

279. At no point did UCLA's private security or the police intervene to stop Isabella from 11 being attacked and sexually harassed by the mob.

12

280. A few minutes later, Isabella saw a mob member wearing Jimi's bright green Legal 13 Observer hat that had been stolen earlier. When she tried to follow the thief to retrieve the hat, a 14

group of mob members blocked her so the thief could run away.

15

281. Isabella turned her attention back to a line of riot police who had moved in and 16 pushed a group of encampment students out into the street near the flagpole where they appeared to 17

detain them and allow the mob to harass and threaten them. While filming this scene, a female mob 18

member accosted Isabella threatening to steal Isabella's phone and yelling "Shut the fuck up, 19

bitch!" in plain view of the police standing nearby, who do nothing to intervene. 20

282. Soon after her harrowing experience, Isabella sent a letter to the Dean of UCLA 21

School of Law on May 4, 2024, asking for urgent safety accommodations for law students required 22

to take their finals on campus in person. Isabella's email also asked for a meeting to relay her 23

experience of being attacked on UCLA's campus and her concerns with the police and UCLA's 24

failure to protect students. The Dean delayed meeting with Isabella until well into the summer. 25

When Isabella was finally granted a meeting with the Dean, the Dean told her, coldly, that he could 26

not say anything in response about what had happened.

27

283. Isabella continues to suffer psychologically and emotionally to this day. She has 28 experienced panic attacks, anxiety, uncontrollable crying, insomnia, and nightmares following the

- 46 -

## COMPLAINT

1

attacks by the mob, and UCLA's and the police's failure to protect her. She no longer feels safe on 2

UCLA's campus.

3

### **Roe 4**

4

284. Roe 4 is a PhD candidate at UCLA and teaches as a graduate assistant. Roe 4 is also 5

active on campus, supporting many student organizations. He received his undergraduate degree 6

from a UC, where he conducted research and was a member of Students for Justice in Palestine. At 7

all relevant times, he was a resident of Los Angeles County.



8

285. Roe 4 was present at the Palestine Solidarity Encampment starting on April 25, 2024. 9

He experienced near-constant harassment, verbal abuse, and threats from the mob, and suffered 10

numerous injuries as a result of UCLA's failure to protect its students against the mob and the 11

actions of the police.

12

286. On the night of Sunday, April 28, 2024, Nouri Mehdizadeh was harassing the 13

encampment by blasting music used by Israelis for torture and brandishing a knife while attempting 14

to cut through part of the safety barricades. When Mehdizadeh acknowledged that he had a knife, 15

Roe 4 yelled for the help of UCLA private security stationed nearby and informed them 16

Mehdizadeh had a weapon. UCLA private security refused to intervene or otherwise help protect 17

those in the encampment.

18

287. On the night of Tuesday, April 30, 2024, the mob sprayed him with chemical 19

munitions, causing severe pain. For nearly an hour, the pain was so bad Roe 4 could not open his 20

eyes.

21

288. As Roe 4 was being treated by encampment medics, the mob shot fireworks into the 22

encampment. Roe 4 heard the screams of people being attacked and began transporting injured 23

members of the student encampment to the medic area. Throughout the attack, Roe 4 was hit with 24

chemical munitions. Roe 4 suffered from lung pain and bronchitis for about eight weeks after being 25

attacked with chemical munitions.

26

289. During the police raid of the encampment in the early morning hours of May 2, 27

2024, Roe 4 was doing nothing to threaten anyone, and the police had no reason to think otherwise. 28

- 47 -

## COMPLAINT

1

Despite this, a police officer aimed their weapon directly at Roe 4. Roe 4 ducked to protect himself 2

just before the officer fired their weapon and shot a person standing behind Roe 4. 3

290. Roe 4 was present on June 10, 2024, for the anti-genocide protest on the UCLA 4

campus. Roe 4 asked the police if he could leave, and the police told him he should exit on the other 5

side of the protest, but UCLA private security blocked Roe 4 and others from exiting in that area. 6

Despite this, police kept pushing the crowd of protesters back, and it was beginning to feel very 7

dangerous. Roe 4 asked if he could speak to the commanding officer, and the police said he could 8

not and to keep backing up to leave the area. Without giving a notification of dispersal, police 9

officers then arrested Roe 4 while laughing and taunting him.

10

291. Roe 4 continues to suffer psychologically and emotionally to the present day. Loud 11

noises, such as fireworks and babies' screams, are extremely upsetting and disruptive to  
Roe 4's 12

everyday life.

13

292. Roe 4 and his family have suffered other injuries stemming from the attack. Roe 4 14

has received numerous hate emails and threats, and attempts to get him fired from his job.  
Roe 4's 15

personal information was leaked along with his parents' and sister's information. His  
parents have 16

received many harassing and threatening phone calls.

17

### **Dr. Aaron Palmer**

18

293. Dr. Aaron Palmer was an Assistant Adjunct Professor in the Mathematics 19

Department at UCLA from 2021 to 2024. He graduated from UC Santa Cruz in 2010 with a  
dual 20

degree in Math and Physics and received his PhD in Math from Cornell University in 2016.  
Aaron 21

is also a current participant in the long program on non-commutative optimal transport  
with the 22

Institute for Pure and Applied Math at UCLA. At all relevant times, he was a resident of  
Los 23

Angeles County.

24

294. As an American Jew, Aaron was deeply offended by the weaponization of anti 25

semitism by the United States government and Israel to justify their genocide of the  
Palestinians and 26

by UCLA to suppress pro-Palestinian speech and activism.

27

28

- 48 -

## COMPLAINT

1

295. On June 10, 2024, Aaron joined other students and faculty on campus to bear witness 2

to over 46,000 Palestinians who had been martyred or buried under the rubble by Israel's genocidal 3

assault on Gaza.

4

296. As Aaron and other students and faculty congregated at Dodd Hall on the UCLA 5 campus, police encircled the students and faculty, trapping them in place. Without issuing a 6

dispersal order, police physically attacked Aaron and the other students and faculty present. 7

297. Police beat Aaron with batons during his arrest and zip-tied him so tight that they left 8

painful red marks on his wrists long after they were removed. At one point, Aaron asked an officer 9

to loosen the zip-tie on one of his wrists that was causing the most pain. The officer refused. 10

298. Aaron was scared to go to campus days later after being beaten by police and seeing 11

other faculty, students, and community members being beaten. Combined with the lack of 12

protection by UCLA, Aaron experiences feelings of isolation and fear each time he passes Dodd 13

Hall because of the intimidation and violence he experienced on June 10.

14

**Mahmoud Alnaouq**

15

299. Plaintiff Mahmoud Alnaouq is a Palestinian-American protester and a student at 16  
UCLA. Mahmoud has won numerous awards from UCLA for his service, leadership, and 17  
humanitarianism. At all relevant times, he was a resident of Los Angeles County. 18

300. As a Palestinian, Mahmoud has lost family members and friends to Israel's  
genocide 19

in Gaza. He was demoralized by the discrimination that Palestinians and those advocating  
for 20

Palestinians experienced at UCLA.

21

301. On June 10, Mahmoud was present for less than an hour at the funeral march,  
when 22

police suddenly blocked everyone's exit, trapping him. Mahmoud never heard the police  
give a 23

warning or dispersal order.

24

302. As police backed Mahmoud and a group of protesters into a corner, police officers 25  
severely beat two men, one of whom was a colleague. Witnessing the escalating violence  
by police, 26

Mahmoud appealed to Corporal Adams, the highest-ranking police officer there, to get the  
police 27

under control. He warned that the police were going to cause serious injuries if they  
continued to 28

use excessive force on this trapped crowd.

- 49 -

COMPLAINT

1

303. Sergeant Strawberry aggressively approached Mahmoud, who was peacefully 2 protesting, and violently yanking his arm, causing immense pain. Strawberry also ripped a 3

Palestinian flag off of Mahmoud's bracelet.

4

304. Mahmoud was then told for the first time that he was part of an illegal gathering and 5 took him inside Dodd Hall. An officer cut the straps of Mahmoud's backpack and removed his 6

wallet. After about two and a half hours of further detention, an officer finally cut his zip ties and 7

released him. Mahmoud had painful red marks, cuts, and bruises on his wrists for days. 8

305. Mahmoud had serious pain in his right shoulder from when Sergeant Strawberry 9 violently attacked him. Mahmoud sought treatment for his injuries. To this day, Mahmoud 10

continues physical therapy exercises.

11

306. After being violently assaulted by police, Mahmoud did not feel safe living in his 12 UCLA housing. He had nightmares of police raiding his home and did not feel comfortable being 13

on campus. Mahmoud continues to suffer psychologically and emotionally to the present day. 14

### **Joseph Murphy**

15

307. Plaintiff Joseph Murphy is a 2026 PhD candidate at UCLA working as a teaching 16 assistant in the School of Sociology. At all relevant times, he was a resident of Los Angeles County. 17

308. As a member of UCLA's Graduate Student Union, Joseph was also opposed to the 18

violent police raid on the Palestine Solidarity Encampment and UCLA's general mistreatment of 19

pro-Palestinian protesters. Joseph felt compelled to help protect fellow students, knowing that 20

UCLA had failed to do so previously, and instead had punished pro-Palestinian activism. 21

309. On June 10, 2024, police attacked protesters without giving any dispersal order in 22 that area, trapping Joseph and everyone inside. People started to panic, and many tried to leave, but 23

the police blocked them, yelled "Get back!" and physically pushed and crushed them inside. 24

310. Police kettled protesters, forcing them into a small space with no exit. While 25 standing in place, shielding the small woman from the attacking police, a police officer grabbed 26

Joseph by the legs from behind, forcing him violently to the ground. Joseph tried to catch his breath 27

while an officer yelled at him to put his hands behind his back.

28

- 50 -

## COMPLAINT

1

311. Joseph did not resist. However, when the officer tried to force Joseph's left arm 2 behind Joseph's back at an impossible angle, causing an immense amount of pain, Joseph 3

readjusted his arm. Despite complying with the arrest, the police yelled at him to "Stop resisting!" 4

312. Police put zip-ties on so tight it caused Joseph pain, and they later had to replace 5 them. Joseph has scarring from his injuries that persist to this day. Joseph's hand was badly cut and 6

had been bleeding for a while. An officer asked Joseph if he had HIV or syphilis and forced him to 7

sit with his still-bleeding hand zip-tied behind his back.

8

313. After processing Joseph, the police asked Joseph to sign his citation. He asked if he 9 could have a glove or otherwise treat his bleeding hand. Police gave him a glove so he could sign 10

his citation without getting blood on the pen.

11

### **Graeme Blair**

12

314. Plaintiff Graeme Blair is a pro-Palestinian protester and an associate professor of 13 political science at UCLA, where he has taught since 2016. He is the recipient of awards, including 14

the Leamer-Rosenthal Prize for Open Social Science, the Society for Political Methodology's best 15

statistical software award, and the best book award from the American Political Science Association 16

Experiments Section. Graeme has published two books and numerous articles in peer-reviewed 17

journals, including on subjects of violence and policing. At all relevant times, he was a resident of 18

Los Angeles County.

19

315. Graeme is opposed to Israel's occupation of Palestine and UCLA's refusal to cut ties 20

with Israeli universities that sustain the occupation. As a faculty member, he also believes that the 21



teaching mission of the university extends beyond the classroom—including protests—and that 22

protecting student speech and conscience is important for our society, not just campus life. 23

316. As a member of the Faculty for Justice in Palestine at UCLA, Graeme was present at 24

the Palestine Solidarity Encampment multiple days from April 25 until his violent arrest on May 2. 25

317. At approximately 11:00 AM on April 25, Graeme was supporting the safety team for 26 the encampment near the fountain where Zionist counter protesters had gathered to harass and 27

assault pro-Palestinian protesters. One counter protester who was a UCLA faculty member 28

physically assaulted Graeme, pushing him around at the gate to the encampment. Others yelled

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## COMPLAINT

1

obscenities, threats, and insults at Graeme and his colleagues, at times within inches of Graeme and 2

other pro-Palestinian protesters. Later, the group of counter protesters escalated further, trying to 3

enter the encampment by breaking down safety barricades.

4

318. Graeme was physically threatened by their attempt to enter and had to stand in a line 5

of students to help protect the encampment because UCLA's private security would not help protect 6

them. Over the next several days, UCLA private security allowed violent and threatening counter 7

protester attack pro-Palestinian encampment members.

8

319. On April 28, the group of counter protesters continued to escalate, previewing what 9 would become the full-fledged mob attack on April 30. They insulted and threatened Graeme, 10

calling him a “murderer.” As the attackers became more aggressive and threatening, Graeme and 11

other faculty exited the encampment and attempted to de-escalate the tensions. The attackers 12

responded to these peaceful acts by assaulting Graeme and his colleagues, shoving them repeatedly. 13

320. On April 30, 2024, Graeme attended a call between the UCLA FJP and SJP chapters, 14

where students said that they felt very unsafe at the encampment and requested that the faculty help 15

support them, especially at night. Graeme signed up to serve as a faculty representative that night. 16

Before he was scheduled to be at the encampment, Graeme received a text informing him that a 17

mob was amassing and threatening the encampment.

18

321. Graeme arrived at the encampment shortly after 10:30 PM to see the mob violently 19

attack the encampment. Graeme tried to get the UCLA administration to help stop the violent mob 20

attack. At times, he was terrified when there was no protection between himself and the attacking 21

mob.

22

322. The mob sprayed chemical munitions into the encampment, temporarily blinding 23  
Graeme and causing him to fall to the ground in extreme pain. Graeme experienced intense  
burning 24

in different parts of his face and eyes for nearly 30 minutes. Despite receiving medical  
attention 25

from a member of the encampment, the burning remained very painful for hours. At around  
6:00 26

AM on May 1, Graeme's face was still burning.

27

323. Graeme watched as California Highway Patrol (CHP) officers eventually arrived  
and 28

got down on one knee. Having seen photos of the police massacring students at Kent State,  
where

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## COMPLAINT

1

police were similarly positioned on one knee, Graeme became more terrified than he had  
ever been 2

in his entire life—fearing that he was about to be killed by CHP.

3

324. Graeme returned to campus later on May 1 to speak at a press conference with  
other 4

UCLA faculty and conduct interviews. Around 2:00 PM, Graeme entered the encampment.  
From 5

about 6:00 PM onward, Graeme was terrified that police would violently attack the  
encampment. 6

Police formed large columns and marched around nearby. Graeme saw on social media  
that there 7

were police snipers on top of the roof of Powell, and he saw police peering out of Royce Hall. 8

Graeme called on UCLA administrators not to send in the police since they would be violent. 9

325. At or around 1:30 AM on May 2, Graeme did a live interview on CNN as police 10 further amassed at the encampment. Graeme formed a line with others holding a banner identifying 11

them as UCLA faculty in the hope that they could help protect UCLA students from police 12

violence.

13

326. Police arrested Graeme and forced him to sit under a tree at the northeast corner of 14

the encampment in an extremely painful position with his arms locked behind his back. Police 15

transferred Graeme to a Sheriff's facility around 8:00 AM in a vehicle without seatbelts, while he 16

remained zip-tied in an extremely painful position.

17

327. Graeme continues to suffer psychologically and emotionally to this day. He was 18 diagnosed with PTSD after the events of April 30 and May 1 by a clinical psychologist at UCLA. 19

## **Roe 5**

20

328. Plaintiff Roe 5 is a Professor at UCLA and earned her PhD from UC San Diego. 21

Apart from being a teaching assistant, she organized with communities facing economic and social 22

challenges. At all relevant times, she was a resident of Los Angeles County.

23

329. Throughout her academic career, Roe 5 has participated in nonviolent protests at 24 immigrant detention centers and actions in support of Black Lives Matter.

25

330. Roe 5 was present at the encampment daily from April 25 to May 1, 2024. On April 26 25, 2024, Roe 5 arrived at the encampment around 7:00 AM, bringing breakfast but left to teach 27

class afterward. When she returned that night, Roe 5 was part of a safety team to protect peaceful 28

encampment members from Zionists threatening violence from entering the encampment.

- 53 -

## COMPLAINT

1

331. This group included Eli Tsives, a young mob member wearing an “Israeli Defense 2 Forces” shirt. He aggressively approached her and attempted to intimidate her. She left the 3

encampment around 10:00 PM that night.

4

332. On April 28, 2024, Roe 5 arrived at the encampment around 8:00 AM. She attended 5 de-escalation and know-your-rights training and agreed to join the group stationed by the Jumbotron 6

set up by the increasingly violent counter protesters. Throughout the day, they insulted and taunted 7

Roe 5 and others. Eventually, Roe 5 joined two other UCLA faculty members to de-escalate. A 8

counter protester hit her with a wooden flagpole repeatedly and blasted a megaphone near her ears, 9

a precursor to the violent attack that would occur on April 30. Roe 5 left the encampment that night 10

around 2 hours after the Zionist rally ended.

11

333. On April 29, 2024, Roe 5 arrived at the encampment in the morning. She witnessed a 12

student being violently arrested around 10:00 AM while on top of the scaffolding on the East end of 13

Powell Library while attempting to place a Palestinian flag on the scaffolding. Witnessing the police 14

attack a student was very traumatizing for Roe 5.

15

334. In response to the escalating violence by the counter protesters, Roe 5 agreed to 16

serve as part of the safety team for the encampment. On April 30, 2024, she went to bed at home 17

around 9:00 PM but was awakened at 11:00 PM by her partner, informing her that she needed to 18

return immediately because a violent mob was attacking the encampment.

19

335. As Roe 5 arrived at the encampment sometime after 11:00 PM, she saw hordes of 20 people descending on the campus and police helicopters hovering overhead. She joined the safety 21

team next to the perimeter on the east side of the encampment where the mob was violently 22

attacking.

23

336. Roe 5 spent hours at the perimeter trying to keep the mob from tearing down the 24 safety barricades and trying to block projectiles thrown by the mob into the encampment. She 25

witnessed the mob repeatedly smash Plaintiff Thistle Boosinger's hand. Witnessing this scene 26

caused Roe 5 emotional trauma.

27

28

- 54 -

## COMPLAINT

1

337. Before Roe 5 could determine if Thistle was safe, someone shouted “tear gas!” as the 2

mob hit her with chemical munitions. She felt like she was suffocating and needed to vomit. The 3

mob also sprayed chemical munitions in Roe 5’s eye.

4

338. Eventually, Roe 5 joined other faculty outside of the encampment. As she attempted 5

to de-escalate the attacks by the mob, the mob tried to spray her and other faculty members. 6

339. At 4:00 AM on May 1, Roe 5 took up her shift with the safety team inside the 7  
encampment. Despite the police presence, mob members were still trying to ram down the  
entrances 8

to the encampment, climbing the scaffolding, and attempting to enter the encampment,  
while the 9

jumbotron erected by the mob blasted extremely loud and annoying music, tormenting  
the 10

encampment.

11

340. Since the night of the mob attack, Roe 5 has dealt with serious medical issues that 12  
impact her life. Immediately following the mob attack, she canceled classes and could not  
go to 13

campus. The sight of police and the sound of helicopters cause her terrible anxiety. She cannot be in 14

places with a lot of people and she cannot be near loud noises. She still finds it difficult to return to 15

the UCLA campus and must take anxiety medication to sleep.

16

## **Roe 11**

17

341. Roe 11 was born to a Palestinian father who was ethnically cleansed from his 18 ancestral home in Acre, Palestine, during the 1948 Nakba. Roe 11 grew up as a refugee in Lebanon 19

before moving to the United Kingdom and eventually the United States. At all relevant times, she 20

was a resident of Los Angeles County.

21

342. Roe 11 has two daughters who attended UCLA. Her youngest daughter graduated in 22

2024 and was a member of the Palestine Solidarity Encampment.

23

343. On April 25, Roe 11 was present when Jewish students hosted a Seder service in the 24

encampment and educated other protesters on anti-Zionism. Roe 11 was surprised by the lack of 25

protection of the encampment given the presence of outside Zionist agitators who were ripping 26

down posters and threatening the encampment.

27

344. On April 26, Roe 11 participated in more teach-ins at the encampment and was 28



harassed and threatened by outside Zionist agitators.

- 55 -

## COMPLAINT

1

345. On April 27, Roe 11 arrived at the encampment around 11:30 PM. When she arrived, 2 she was insulted by outside Zionist agitators who were screaming obscenities. They were blaring 3

loud music—the same music that illegal Israeli settlers in the West Bank have used during their 4

violent raids of Palestinian homes and the same music anti-Palestinian Israelis used when blocking 5

humanitarian aid trucks from entering Gaza.

6

346. Roe 11 returned to the encampment on April 30. She was sprayed with chemical 7 munitions by the mob while UCLA private security stood by watched the violence, and allowed the 8

mob to continue their attack. Roe 11 called the UCLA Police Department and public safety several 9

times to request help. When she called the UCLA Police Department, officials hung up on her. 10

347. The mob relentlessly attacked the encampment that night. Roe 11 felt like she was in 11

a war zone. She provided care to multiple injured encampment members. To this day, Roe 11 12

cannot get the terrifying sights and sounds out of her head of the young people in the encampment 13

being attacked, and no one from UCLA or the police coming to help.

14

348. On May 1, Roe 11 complained to the UCLA Police Department, informing them that 15

her daughter was a UCLA student, that she left her daughter in UCLA's care, and that UCLA did 16

nothing to protect her daughter while the outside Zionist agitators violently attacked the 17

encampment for hours.

18

349. Roe 11 returned to the encampment later in the day on May 1. When the police 19

attacked the encampment with flash-bangs, she again felt like she was in a war zone, this time under 20

attack from the militarized police. She heard nonstop screams, and it was terrifying. Knowing that 21

she could no longer help, she left the encampment and helped get others to safety before the police 22

could attack them.

23

350. Roe 11 continues to suffer psychologically and emotionally to the present day. 24

### **Lubna Hammad**

25

351. Plaintiff Lubna Hammad is a Palestinian-American protester, and the founder of 26

Yalla Indivisible, a vibrant community organization dedicated to the civic empowerment and active 27

engagement of Black, Indigenous, and People of Color (BIPOC) communities. Yalla Indivisible has 28

a strong commitment to uplifting Palestinian and Arab voices and a mission to foster a political and

- 56 -

COMPLAINT

1

social environment where the diverse tapestry of its members can fully participate and be heard. At 2

all relevant times, Lubna resided in Orange County, California.

3

352. Lubna first stopped by the encampment on April 27. She arrived at the encampment 4

around 11:30 PM and immediately encountered a tense situation, as counter protesters harassed 5

encampment members and violently attempted to break into the encampment.

6

353. Lubna returned to the encampment on April 30 to support her friend's daughter and 7 other protesters, arriving around 11:30 PM. Chemical munitions burned her eyes as the mob 8

attacked. Mob members screamed obscenities at her in accented Arabic like "bitch" and "slut," just 9

as she has heard Israelis use those Arabic words to insult people in Palestine. One mob member 10

called her a "terrorist." Another attacker looked at Lubna and threatened her, saying, "You don't 11

stand a chance, old lady."

12

354. Mob members threw a blunt item, hitting her left leg, destabilizing her knee, and 13 causing pain and swelling. The pain lasted for months afterward, and her knee feels weaker and still 14

tender to this day.

15

355. The attackers at other points shined a red laser and flashlights in her eyes. Another 16

time, the mob sprayed a viscous chemical munition that stuck in Lubna's hair. At first, she did not 17

know what the substance was, and then the burning started all over her face and eyes. The pain was 18

unending. Even after she received medical attention, the burning remained for a few hours and even 19

came back around 6:00 AM.

20

356. Lubna previously worked as a legal consultant for UNICEF and with Defense for 21 Children International, where she witnessed horrific violence in Palestine firsthand. Her experience 22

at the encampment, being attacked by the mob while authorities refused to intervene, immediately 23

triggered images she experienced in Palestine, where the Israeli military often stands by, watching 24

and allowing illegal Israeli settlers to attack Palestinians, refusing to protect them from such 25

violence.

26

357. In addition to her physical injuries, Lubna continues to suffer psychologically and 27 emotionally to the present day.

28

- 57 -

## COMPLAINT

1

### **Roe 12**

2

358. Plaintiff Roe 12 is a pro-Palestinian protester. He graduated from UCLA in 2024. At 3

all relevant times, he was a resident of Los Angeles County.

4

359. After seeing UCLA and the police fail to protect the encampment and pro 5

Palestinian protesters from the violent mob attack the night before, Roe 12 came to the encampment 6

on May 1 to help support and protect the encampment.

7

360. Roe 12 wore lab goggles to protect his eyes from chemical irritants used by the 8

police during their raid. Around 4:30 AM, Roe 12's goggles were hanging around his neck when a 9

police officer grabbed Roe 12's goggles and dragged him 5 to 6 feet along the ground, causing the 10

strap of his goggles to dig into Roe 12's neck, cutting him and causing him to bleed. The force of 11

the strangulation caused Roe 12 to stop breathing for several moments. After the shock of being 12

strangled by the police wore off, fear began to set in. Despite his injuries, Roe 12 was not offered 13

any medical attention by police until around 9:00 or 10:00 AM.

14

361. As a result of being dragged and strangled by the police, Roe 12 experienced painful 15

bruising and scabs on his neck for over a week. Roe 12 still suffers from psychological and 16

emotional harm from the memory of the police raid and his arrest.

17

**Bharat Venkat**

18

362. Plaintiff Dr. Bharat Venkat is an Associate Professor at UCLA with a joint 19  
appointment spanning the Institute for Society & Genetics, the Department of History, and  
the 20  
Department of Anthropology. He is also the director of the UCLA Heat Lab and is affiliated  
with 21  
the UCLA Center for India & South Asia, the Program in Digital Humanities, the Urban  
Humanities 22  
Initiative, and the Luskin Center for Innovation. Dr. Venkat's research focuses on a range of  
issues 23  
related to science, medicine, climate, race, and design. He has published widely including  
an award 24  
winning book, and was awarded a National Science Foundation Grant. As a Faculty in  
Residence, 25  
Dr. Venkat lives in a UCLA student dorm and provides formal and informal resident-  
faculty 26  
interactions through programming, classes, individual and small-group advising, and  
casual 27  
association. He teaches over 200 UCLA students a year and in 2023 won both the Society  
for 28  
Medical Anthropology's Carole H. Browner Student Mentorship Award and UCLA's Life  
Sciences

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## COMPLAINT

1

Excellence in Educational Innovation Award for his work with students. He is a Los  
Angeles 2

County resident and resided therein at all relevant times in this complaint.

3

363. On April 30, 2024, Dr. Venkat was on campus when he heard loud explosions 4

coming from the area of the encampment, while simultaneously seeing fireworks being shot at the 5

encampment on social media.

6

364. The mob sprayed Dr. Venkat with chemical munitions multiple times. The first time 7  
it happened, he panicked and thought he might lose his eyesight. Dr. Venkat's eyes were  
burning 8

intensely, and he could not see. At other times, he could not breathe or open his eyes  
without getting 9

chemical munitions in his eyes and mouth. Dr. Venkat stayed until around 4:00 AM on May  
1 10

helping injured and terrified students, until they felt safe and got the care they needed,  
before 11

returning home exhausted to sleep.

12

365. Dr. Venkat returned later that day on May 1 for a faculty press conference. At the 13  
press conference, a mob member screamed: "Go back to your country!" and yelled  
homophobic 14

slurs at him. Dr. Venkat, who is gay, experienced additional psychological and emotional  
distress as 15

a result of this.

16

366. Dr. Venkat continues to suffer psychologically and emotionally to this day. He was 17  
unable to work for several months. Dr. Venkat had a book due soon after in 2023 but was  
put 18

several months behind as a result of UCLA's failure to protect students and faculty. 19

367. Dr. Venkat cried in fear in public spaces for months afterward. For an extended 20  
period, Dr. Venkat was not sleeping well. He would sit and stare at the food, unable to eat.  
Some of 21

Dr. Venkat's Muslim students also stopped coming to class due to their fear of UCLA private 22

security and UCPD, and fear that they would not be protected from additional mob violence. 23

## **Roe 7**

24

368. Roe 7 earned her bachelor's degree from UCLA in July 2024. At all relevant times, 25 she was a resident of Los Angeles County.

26

369. Roe 7 attended speeches in the encampment on May 1 over several hours that night, 27

police raided the encampment in waves, each lasting roughly an hour. Police set off flashbangs and 28

- 59 -

## **COMPLAINT**

1

released chemical munitions that obscured her vision and caused her eyes to swell in immense pain. 2

Roe 7's eyes were swollen for multiple days afterward.

3

370. When the police broke into the encampment, Roe 7 watched, terrified, as police 4 violently grabbed her friend and arrested him. The police appeared gleeful like they were happy to 5

be brutalizing students. One officer broke from his formation and made a beeline for the Palestinian 6

flag that was flying inside the encampment, enthusiastically ripping it down and flinging it to the 7

ground.



8

371. Eventually, police, including the one who ripped down the flag, pushed Roe 7 and 9 other protesters back, kettling them toward the library. Roe 7 was not resisting or trying to run, yet 10

police brutally beat her legs with their batons, causing bruises that remained for many days 11

afterward.

12

372. Around 5:15 AM Roe 7 was arrested near the library. One officer zip-tied Roe 7's 13 wrists in a painful position behind her back. Roe 7 repeatedly asked for her zip-ties to be loosened 14

because they were so tight that her wrists were in pain and her fingers were swollen, but police 15

ignored her. Roe 7 asked police several times why she was being arrested, but no police would 16

answer her. Instead, police patted Roe 7 down and forced her to sit on the sidewalk for around an 17

hour.

18

### **Gina Viola Peake**

19

373. Plaintiff Gina Viola Peake is a longtime local activist who organizes with White 20

People for Black Lives (the Los Angeles chapter of Showing Up for Racial Justice). She is a UC 21

alumna, graduating from the University of California, Riverside, and the mother of a current UC 22

student. At all relevant times, she was a resident of Los Angeles County.

23

374. Gina had participated in the movement for justice in Palestine for several years. 24

Given her deep training and experience as a police liaison, a member of the Faculty for Justice in 25

Palestine invited Gina to help with safety and de-escalation for the encampment. 26

375. In the days before the April 30 mob attack, Gina was assaulted by counter protesters 27

as they escalated, vulgarly insulting and threatening her: “Hope you get raped!”, “Dirty whore!”, 28

- 60 -

## COMPLAINT

1

“Go rape yourself with your mask!”, “Go home and kill yourself!”, and “Race traitor!”, among 2

other things.

3

376. On April 28, Gina was present to help with de-escalation efforts and to keep students 4

safe. Gina became increasingly concerned at the escalating violence and threats coming from the 5

mob. One UCLA private security guard mentioned to her how “unhinged” the Zionist mob 6 members were acting, and how calm the pro-Palestinian protesters were.

7

377. Gina returned to UCLA around 11:00 PM on April 30. As she entered campus, Gina 8 saw members of the mob harassing and threatening students. After Gina approached to help de 9

escalate the situation, the mob members terrified Gina, chasing them into the encampment. 10

378. Gina then went to the front of the encampment to help protect it from the mob 11

attacks. For the next hour, the mob attacked Gina and the encampment, throwing dangerous objects 12

and shooting fireworks and chemical munitions into the encampment.

13

379. A mob member hit Gina with a wooden plank as the mob was attacking the wooden 14

safety barricade. The mob attack also left her with an injured thumb for 6 months. 15

### **Eric Wefald**

16

380. Plaintiff Eric Wefald is a pro-Palestinian protester who had attended multiple 17 protests leading up to the UCLA encampment. At all relevant times, she was a resident of Los 18

Angeles County.

19

381. After witnessing the mob attack the encampment on April 30 which was streamed 20 live over social media, Eric went to help. Sometime around 3:00 AM on May 2, Eric was at the 21

front of the line when police, began shooting flashbangs. As police approached, they hit Eric with 22

their batons. Police pushed Eric, who is mixed race and was wearing a keffiyeh, so hard with their 23

baton that he fell to the ground. As soon as he stood up, the police started hitting him again with 24

their batons.

25

382. Police then hit Eric so hard that he collapsed, falling to the ground. While lying face 26 down on the ground, police swung their batons and brutally beat him. Eric did not resist and kept 27

screaming out that he was not resisting while police beat him. At this moment Eric thought they 28  
were going to kill him.

- 61 -

## COMPLAINT

1

383. Once the adrenaline and shock of being beaten up so badly by police wore off 2  
following his release, Eric felt intense pain in his back where police hit him with their  
batons. Eric 3

had bruising down his side and a lot of pain and soreness in his back. Eric was treated for  
his back 4

injuries, which helped to lessen the intensity of the pain, but his back pain continues to this  
day. 5

384. Eric continues to suffer psychologically and emotionally to this day. Sleeping was 6  
difficult for many days. He has sought the help of a therapist after being beaten so severely  
by 7

police. The sound of helicopters and the sight of police continue to cause him anxiety. 8

### **Roe 13**

9

385. Plaintiff Roe 13 was a second-year history student at UCLA at the time of the  
attack. 10

At all relevant times, he was a resident of California.

11

386. On May 1, 2024, on the UCLA Campus, a violent mob sprayed Roe 13 with a dark 12  
yellow substance, which Roe 13 believes, upon information and belief, was a chemical  
munition, 13

that severely damaged Roe 13 and required approximately one month of persistent  
treatment to 14

alleviate the physical pain.

15

387. Roe 13 is currently still receiving psychological treatment as a direct result of the 16  
attack.

17

388. As a direct and proximate result of the attack and Defendants' reckless and  
negligent 18

conduct, Roe 13 suffers from physical injuries, PTSD, and damages, the exact amount of  
which will 19

be determined according to proof at trial.

20

### **Pseudonymous Plaintiffs**

21

389. Plaintiffs Roe 1 through Roe 15, and Plaintiff Mahmoud Alnaouq are pseudonyms for  
the actual names of some of the Plaintiffs.<sup>13</sup> These plaintiffs will seek leave of court to use  
these 22

23

pseudonyms as soon as the defendants have all been served. The pseudonymous plaintiffs  
have all 24

either suffered direct harm themselves or have witnessed harm inflicted upon others for  
voicing 25

opposition to Israel's genocidal attack on Gaza and the legitimate national aspirations of  
the 26

Palestinian people. Plaintiffs or people known to them have been threatened with violent  
harm, have 27

28

<sup>13</sup> One pseudonymous plaintiff has chosen the name of Mahmoud Alnaouq to honor the  
memory of his friend who was a university student in Gaza, and was killed along with his  
entire family when Israel bombed their apartment building.

## COMPLAINT

1

been fired from their jobs, or have been subjected to online hate campaigns. The  
pseudonymous 2

plaintiffs respectfully submit that their legitimate interest in security and privacy on  
balance 3

outweighs the public's right to access court information. Once pseudonymous status is  
granted, 4

these plaintiffs will seek an appropriate "Attorneys-Eyes Only" protective order so that  
defendants' 5

counsel may know their identities without defendants themselves learning this  
information. 6

## THE DEFENDANTS

7

### Rioting Mob Defendants

8

390. The following Defendants actively participated in a mob that staged brutal, hours. 9  
-long riot against the students and others who had peacefully assembled at the  
encampment. Each of 10

these persons cooperated or worked in concert with at least two other persons to engage in  
violence 11

or threaten violence for the purpose of intimidating or retaliating against journalists,  
protestors, and 12

members of the encampment for exercising their civil or constitutional rights. The "Riot 13  
Defendants" identified also cooperated with and worked in concert with persons as yet  
unknown 14

who helped organize, equip, or finance the riot. Those unknown persons are therefore  
names as Doe 15

Defendants and Plaintiffs will amend this complaint as their identities become known. 16

391. In doing these things, the Riot Defendants were motivated by, *inter alia*, the actual or 17

perceived race, color, religion, ancestry, or national origin of the Plaintiffs or those whom they were 18

among; or because of the actual or perceived race, color, religion, ancestry, or national origin, of 19

those with whom the Plaintiffs associated.

20

392. Isaac Bokhoor is a Beverly Hills resident and co-owner of Angel City Jewelers. 21

Bokhoor is sued in his capacity. Bokhoor attacked Plaintiff Thistle Boosinger, repeatedly smashing 22

her exposed hand with a metal rod-like object, breaking her hand and severing a nerve in her ring 23

finger, causing Thistle excruciating pain.

24

393. Matin Mehdizadeh is a Los Angeles resident who participated in the mob attack at 25

UCLA, working in concert with other mob attackers to assault, batter, and violate the civil rights of 26

Plaintiff Catherine Hamilton.

27

394. Tom Bibiyan is a 45-year-old Los Angeles resident and local entrepreneur. 28

Defendant Bibiyan attacked several protesters on the night of April 30, including Plaintiff Dolores

- 63 -

COMPLAINT

1

Quintana. Bibiyan is seen on video attacking the encampment and conspiring with others to terrify 2

them as part of the mob attack.

3

395. Jared Rubin is a Los Angeles resident who participated in the mob attack at UCLA, 4 working in concert with other mob attackers to assault, batter, and violate the civil rights of 5

Plaintiffs Jimi Degen and Isabella Lee.

6

396. Nouri Mehdizadeh is a Los Angeles resident who harassed and brandished a knife at 7

the encampment on April 28 and who participated in the April 30 mob attack at UCLA, working in 8

concert with other mob attackers to assault, batter, and violate the civil rights of Plaintiff Catherine 9

Hamilton.

10

397. Edan On is a 19-year-old Los Angeles resident who was arrested by Los Angeles 11 Police for alleged assaults at UCLA during the encampment. On led mob attacks on the 12 encampment, viciously beating protesters and terrorizing them throughout the night, including 13

Plaintiff Dolores Quintana and Afnan Khawaja.

14

398. Eyal Shalom is a Los Angeles resident and part of the mob attack on the Palestine 15 Solidarity Encampment. In coordination with Defendant Anthony Prouzinin, Shalom sprayed 16

Plaintiff Dolores Quintana in the eyes with a chemical munition as she stood peacefully filming the 17



crowd as part of the mob's overall coordination to attack the encampment. Shalom also attacked 18

Plaintiff Catherine Hamilton on April 30, 2024.

19

399. Anthony Prouzinin is a Los Angeles resident who was present on the night of the 20 mob attack. He is seen on camera blinding Plaintiff Dolores Quintana while co-Defendant Eyal 21

Shalom sprays her with chemicals directly in the eyes. Upon information and belief, Prouzinin 22

attacked protesters with chemical weapons, yelled racist epithets at pro-Palestinian protesters, and 23

coordinated with others in the mob.

24

400. Upon information and belief, Eliran Bismut attacked protesters with chemical 25 weapons, threw objects at protesters, yelled racist epithets at pro-Palestinian protesters, and 26

coordinated with others to violently attack Plaintiffs and prevent them from exercising their civil 27

rights. Upon information and belief, Eliran Bismut blasted Plaintiff Angelica Jit in the head with a 2 28

X 4 wooden plank,

- 64 -

## COMPLAINT

1

401. Upon information and belief, Daniel Khalili attacked protesters with chemical 2 weapons, threw objects at protesters, yelled racist epithets at pro-Palestinian protesters, and 3

coordinated with others to violently attack Plaintiffs and prevent them from exercising their civil 4

rights. Upon information and belief, Khalili worked in concert with other mob attackers to assault, 5

batter, and violate the civil rights of Plaintiffs Jimi Degen and Isabella Lee.

6

402. Upon information and belief, Rony Abishoor attacked protesters with chemical 7 weapons, threw objects at protesters, yelled racist epithets at pro-Palestinian protesters, and 8

coordinated with others to violently attack Plaintiffs and prevent them from exercising their civil 9

rights, including Plaintiff Isabella Lee.

10

403. Jonathan Yashar Kavian is a 35-year-old attorney who resides in or maintains an 11 office in Laguna Beach, California. Upon information and belief, Yashar attacked protesters with 12

chemical weapons, yelled racist epithets at pro-Palestinian protesters, and coordinated with others in 13

the mob.

14

404. David Merabi is an attorney for Culver Legal, LP, in the City of Los Angeles. Upon 15 information and belief, Merabi attacked protesters with chemical weapons, yelled racist epithets at 16

pro-Palestinian protesters, and coordinated with others in the mob.

17

405. Roy Elbaz is a Los Angeles resident who participated in the mob attacks at UCLA on 18

April 30, 2024. He is childhood friends with Edan On. Upon information and belief, Elbaz attacked 19

protesters with chemical weapons, threw objects at protesters, yelled racist epithets at pro 20

Palestinian protesters, and coordinated with others to violently attack Plaintiffs and prevent them 21

from exercising their civil rights.

22

406. Brad Hisle is a Los Angeles resident who brandished a large, bat-like weapon and 23  
attacked protesters during the mob attack at UCLA. Upon information and belief, Hisle  
attacked 24

protesters with chemical weapons, threw objects at protesters, yelled racist epithets at pro  
25

Palestinian protesters, and coordinated with others to violently attack Plaintiffs and  
prevent them 26

from exercising their civil rights.

27

407. Upon information and belief, Arlan Mitnick attacked protesters with chemical 28  
weapons, threw objects at protesters, yelled racist epithets at pro-Palestinian protesters,  
and

- 65 -

## COMPLAINT

1

coordinated with others to violently attack Plaintiffs and prevent them from exercising their  
civil 2

rights.

3

408. Edwin Kohen is a Los Angeles resident and owner of Eddie's Exotics and Wall 4  
Street Farms, LLC. Defendant Kohen is sued in his capacity. Upon information and belief,  
Kohen 5

attacked protesters with chemical weapons, threw objects at protesters, yelled racist  
epithets at pro 6

Palestinian protesters, and coordinated with others to violently attack Plaintiffs and prevent them 7

from exercising their civil rights.

8

409. Upon information and belief, Malachi Joshua attacked protesters with chemical 9 weapons, threw objects at protesters, yelled racist epithets at pro-Palestinian protesters, and 10

coordinated with others to violently attack Plaintiffs and prevent them from exercising their civil 11

rights.

12

410. Upon information and belief, Ronald Mishiyeve attacked protesters with chemical 13 weapons, threw objects at protesters, yelled racist epithets at pro-Palestinian protesters, and 14

coordinated with others to violently attack Plaintiffs and prevent them from exercising their civil 15

rights.

16

411. Upon information and belief, Marlan Librett attacked protesters with chemical 17 weapons, threw objects at protesters, yelled racist epithets at pro-Palestinian protesters, and 18

coordinated with others to violently attack Plaintiffs and prevent them from exercising their civil 19

rights.

20

412. Upon information and belief, Alon Abishoor attacked protesters with chemical 21 weapons, threw objects at protesters, yelled racist epithets at pro-Palestinian protesters, and 22

coordinated with others to violently attack Plaintiffs and prevent them from exercising their civil 23

rights.

24

413. Upon information and belief, Shai Abishoor attacked protesters with chemical 25 weapons, threw objects at protesters, yelled racist epithets at pro-Palestinian protesters, and 26

coordinated with others to violently attack Plaintiffs and prevent them from exercising their civil 27

rights.

28

- 66 -

## COMPLAINT

1

414. Upon information and belief, the violent attacks committed on April 30, 2024, by 2 Defendants terrorized Plaintiffs, prevented them from further exercising their civil rights that night, 3

and had a chilling effect on their willingness to exercise their civil rights in support of Palestinians 4

to this day.

5

415. Upon information and belief, the violent attacks committed by Defendants were 6 coordinated with other Defendants to terrorize Plaintiffs, preventing them from further exercising 7

their civil rights that night and having a chilling effect on their willingness to exercise their civil 8

rights in support of Palestinians to this day.

9

**University of California and UCLA Defendants**

10

416. Defendant Regents of the University of California is a public agency within the 11 meaning of Cal. Gov't Code § 7920.525(a) and is empowered under the California Constitution, 12

Article IX, Section 9, to administer the University of California, including UCLA and UCPD. As 13

the governing body for the University of California system, the Board of Regents has “full powers 14

of organization and government” under Article IX, Section 9, of the California Constitution. The 15

Board of Regents has its principal place of operation in Oakland, California.

16

417. Defendant Dr. Michael V. Drake is the current President of the University of 17

California and has served in that position since August 2020. As President, Drake oversees and is 18

responsible for the operations of the entire University of California system, which includes UCLA. 19

Drake is sued in his official capacity. Drake resides in California.

20

418. At all times material hereto Defendant Dr. Gene D. Block was the Chancellor of 21 UCLA. He served in that role from August 2007 to July 31, 2024. As Chancellor, Block was the 22

highest-ranking university official at UCLA. Block’s duties included establishing campus policies, 23

goals, and strategy. He is sued in his personal capacity. On information and belief, Block resides in 24

the County of Los Angeles.

25

419. Dr. Julio Frenk is the current Chancellor of UCLA, and his duties include 26  
establishing campus policies, goals, and strategy. He is sued in his official capacity. Frenk  
works in 27

the County of Los Angeles and, on information and belief, resides in the County as well. 28

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## COMPLAINT

1

420. Defendant Dr. Darnell Hunt is the current Executive Vice Chancellor and Provost of 2  
UCLA and has served in that position since September 2022. He is sued in his official  
capacity. 3

Hunt works in the County of Los Angeles and, on information and belief, resides in the  
County as 4

well.

5

421. Defendant Michael J. Beck is the current Administrative Vice-Chancellor of UCLA 6  
and has served in that position since March 2016. Beck was in charge of the public  
safety 7

operations of the school at all relevant times from October 7, 2023, through June 10,  
2024. 8

Defendant Beck is sued in his official capacity. Beck works in the County of Los Angeles  
and, on 9

information and belief, resides in the County as well.

10

422. Defendant Monroe Gorden, Jr., is the current Vice Chancellor, Student Affairs, of 11  
UCLA and has served in that position since April 2018. Gorden is sued in his official  
capacity. 12

Gorden works in the County of Los Angeles, and on information and belief, resides in the  
County as 13

well.

14

423. Defendant Rick Braziel is the Associate Vice Chancellor for Campus Safety at 15  
UCLA. In this role, Braziel serves as the head of the newly created Office of Campus Safety  
at 16

UCLA, which, as of May 5, 2024, oversees the UCLA Police Department (“UCPD”). Braziel  
is 17

sued in his official capacity. Braziel works in the County of Los Angeles and, on information  
and 18

belief, resides in the County as well.

19

424. UCPD is directly under the control of its interim Chief, Scott Scheffler. Scheffler 20  
reports to Rick Braziel and, ultimately, to the Chancellor, both of whom have ultimate  
decision 21

making authority over it.

22

### **Defendants Generally**

23

425. Upon information and belief, Plaintiffs allege that each of the individually named 24  
defendants and each Doe Defendant was the agent, servant, employee, or co-conspirator  
of all other 25

defendants.

26

426. Defendant Does 1-5, each of them a private business or government entity, the 27  
identity of which is presently unknown but participated in the tortious conduct described in  
this 28

- 68 -

COMPLAINT



1

Complaint. When their identity does become known to the Plaintiffs, the Plaintiffs will seek leave 2

of court to amend this complaint accordingly.

3

427. Defendant Does 6-20 and each of them were contracted to or employed by the 4  
Regents, the City of Los Angeles, the California Highway Patrol, or Does 1-5, and  
participated in or 5

were otherwise legally responsible for the tortious conduct described in this Complaint.  
When their 6

identity does become known to the Plaintiffs, the Plaintiffs will seek leave of court to  
amend this 7

complaint accordingly.

8

428. Defendant Does 21-100, and each of them financed, organized, facilitated, 9  
encouraged, or otherwise aided the Riot Defendants, with the knowledge that the Riot  
Defendants 10

would engage in the tortious conduct described in this Complaint. When their identity does  
become 11

known to the Plaintiffs, the Plaintiffs will seek leave of court to amend this complaint  
accordingly. 12

429. Defendants Do 101-125 were employees, agents, or contractors of the Defendant 13  
Regents and were willfully, deliberately, tortiously, or negligently responsible for the acts  
alleged 14

herein and the resulting injuries to Plaintiffs.

15

#### **CLAIMS FOR RELIEF**

16

## **FIRST CAUSE OF ACTION**

17

**For Interference with Civil Rights by Means of Threats, Intimidation, or Coercion** 18

**In Violation of Cal. Civ. Code § 52.1 Tom Bane Civil Rights Act**

19

***By Plaintiffs Graeme Blair, Shandra Campbell, Jakob Johnson, Binyamin Moryosef, Joseph Murphy, Aaron Palmer, Gina Viola Peake, Faraaz Qureshi***

20

***Eric Wefald, Mahmoud Elnaouq, and Roes 1, 2, 3, 4, 6, 7, 8, 9, 10, 12, 13, and 14*** 21

***Against All Government Defendants and Does 98-125***

22

430. Plaintiffs repeat and replead the allegations of the preceding paragraphs and 23  
incorporate them as though fully set forth herein.

24

431. California Civil Code 52.1 prohibits any “person or persons, whether or not acting 25  
under color of law” from interfering “by threat, intimidation or coercion” with the “exercise  
or 26

enjoyment by any individual or individuals of rights secured by the Constitution or laws of  
the 27

United States, or of the rights secured by the Constitution of laws of this state.” Civ. Code. §  
52.1. 28

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## **COMPLAINT**

1

432. Art. I, §2 of the California Constitution guarantees Plaintiffs the same rights as 2

“[E]very person [to] freely speak, write and publish his or her sentiments on all subjects. . .”  
and 3

demands that “A law may not restrain or abridge liberty of speech or press.”

4

433. Defendants interfered by threat, intimidation, or coercion with Plaintiffs’ exercise or 5  
enjoyment of their speech, expression, and associational rights guaranteed by the  
Constitution of the 6

State of California and the United States when Defendants decided to impermissibly shut  
down 7

Plaintiffs’ protected activities at the Palestine Solidarity Encampment.

8

434. This decision to shut down the Plaintiffs’ protected activities at the encampment  
was 9

without legal justification, especially because the Plaintiffs themselves did not violate any  
criminal 10

law or university policy at any point during their participation and association with the 11  
encampment.

12

435. Nevertheless, in a message on the morning of May 1, Defendants threatened and 13  
intimidated Plaintiffs—and all other UC-affiliated personnel—with academic discipline if  
they 14

remained at the site of the encampment.

15

436. Defendants then used threats, intimidation, and coercion, which forced Plaintiffs  
to 16

vacate the premises through the illegal use of an unlawful assembly declaration. In so  
doing, they 17

employed actual threats and coercion by declaring the site of the encampment an unlawful  
assembly 18

and threatening to arrest, and causing the arrest of, anyone who did not disperse. 19

437. All Plaintiffs listed herein reasonably believed that one or more of the above-named 20 defendants or their agents would direct the commission of violence or commit violence against 21 them if they continued to exercise their civil rights and liberties to prevent Plaintiffs from exercising 22 their civil rights and liberties and that each of the defendants had the apparent ability to cause such 23 threats to be carried out.

24

438. All Plaintiffs listed herein reasonably believed that they would be subjected to 25 academic discipline as students and/or labor discipline as faculty or staff if they continued to 26 exercise their civil rights and liberties, and that each of the defendants had the apparent ability to 27 cause such threats to be carried out.

28

- 70 -

## COMPLAINT

1

439. As a direct and legal result of Defendants' actions, Plaintiffs have suffered mental 2 and emotional distress, have lost income and the ability to earn future income, and have incurred 3 related expenses. The amount of general and compensatory damages shall be proven at trial. 4

440. In doing the things hereinabove alleged Defendants Drake, Block, Hunt, Beck, 5 Scheffler, Gordon, and Braziel, and Does 1-20, and each of them, acted with deliberate disregard of 6

the rights and safety of Plaintiffs, and are therefore liable for punitive damages in amounts 7

sufficient to punish the defendants sued herein and to deter future similar misconduct. 8

441. The Plaintiffs intend to continue attending and participating in demonstrations but 9  
fear further assault and other retaliation.

10

## **SECOND CAUSE OF ACTION**

11

### **For Interference with Civil Rights by Means of Violence**

#### **In Violation of Cal. Civ. Code § 52.1 Tom Bane Civil Rights Act**

12

***By Plaintiffs Graeme Blair, Faraaz Qureshi, Shandra Campbell, Roe 12, Jakob Johnson, 13***

***Binyamin Moryosef, Joseph Murphy, Aaron Palmer, Gina Viola Peake, Eric Wefald, Mahmoud Elnaouq, and Roes 1, 2, 4, 6, 7, 8, 9, and 10, and 12.***

14

***Against All Government Defendants and Does 98-125***

15

16

442. Plaintiffs repeat and replead the allegations of the preceding paragraphs and 17  
incorporate them as though fully set forth herein.

18

443. Each of the Plaintiffs named herein was violently attacked by agents of the 19  
government entity defendants to prevent Plaintiffs from exercising their civil rights and  
civil 20

liberties or to retaliate against them for doing so.

21

444. In doing the acts hereinabove alleged, the agents of the government entity  
defendants 22

who attacked one or more Plaintiffs did not do so in the course of exercising reasonable  
force to 23

effect a lawful arrest, but in fact did so to prevent Plaintiffs from exercising their civil rights,  
or to 24

retaliate against them for doing so.

25

445. As a direct and legal result of this violence, Plaintiffs suffered physical injuries, 26  
mental and emotional distress; have lost income and future earning capacity; and have  
incurred 27

medical expenses. The conduct of defendants sued in this cause of action was a  
substantial factor in 28

- 71 -

## COMPLAINT

1

causing such harm, entitling Plaintiffs to special damages and general compensatory  
damages in an 2

amount to be proven at trial.

3

446. In doing the things hereinabove alleged Defendants Drake, Block, Hunt, Beck, 4  
Gordon, and Braziel, and Does 1-20, and each of them, acted with deliberate disregard of  
the rights 5

and safety of Plaintiffs, and are therefore liable for punitive damages in amounts sufficient  
to punish 6

the defendants sued herein and to deter future similar misconduct.

7

447. Plaintiffs intend to continue attending and participating in demonstrations but fear 8

further assault and other retaliation.

9

### **THIRD CAUSE OF ACTION**

10

**For Interference with Civil Rights by Means of Threats, Intimidation, or Coercion, and Overt Violence in Violation of Cal. Civ. Code § 52.1 Tom Bane Civil Rights Act** 11

***By Plaintiffs Graeme Blair, Thistle Boosinger, Shandra Campbell, James (Jimi) Peric*** 12

***Degen, Catherine Hamilton, Jakob Johnson, Isabella Lee , Binyamin Moryosef, Dolores Quintana, Bharat Venkat, Angela Jit, Afnan Khawaja, and Roes 1, 3, 4, 5, 6, 7,***

13

***8, 9, 10, 11, 12, 13,14, and 15***

14

***Against All Riot Defendants and Does 55-97***

15

16

448. Plaintiffs repeat and replead the allegations of the preceding paragraphs and 17  
incorporate them as though fully set forth herein.

18

449. California Civil Code 52.1 prohibits any “person or persons, whether or not acting 19  
under color of law” from interfering “by threat, intimidation or coercion” with the “exercise  
or 20

enjoyment by any individual or individuals of rights secured by the Constitution of laws of  
the 21

United States, or of the rights secured by the Constitution of laws of this state.” Civ. Code. §  
52.1. 22

450. Art. I, §2 of the California Constitution guarantees Plaintiffs the same rights as 23

“[E]very person [to] freely speak, write and publish his or her sentiments on all subjects. 24

451. Defendants threatened immediate physical violence and harm, made intimidating 25 gestures, charged Plaintiffs, and assaulted them with fists, clubs, incendiary and explosive devices, 26

and toxic chemicals. These violent attacks—whether experienced or witnessed by Plaintiffs— 27

intimidated, threatened, and coerced Plaintiffs and interfered with Plaintiffs’ exercise or enjoyment 28

- 72 -

## COMPLAINT

1

of their speech, expression, associational rights, and newsgathering guaranteed by the Constitution 2

of the State of California and the United States Constitution.

3

452. Defendants attacked Plaintiffs both inside and outside of the Palestine Solidarity 4 Encampment to punish Plaintiffs for exercising their constitutional rights, including speech, 5

expression, associational rights, and newsgathering, and to attempt to shut down Plaintiffs’ 6

protected activities.

7

453. There was no lawful justification for the RIOT DEFENDANTS to commit violence 8 against and threaten violence against the Plaintiffs because of their perceived political affiliation 9

while the Plaintiffs were engaged in First Amendment activity or because of their perceived 10



membership in or association with persons of a particular race, national origin, religion, or ethnic 11

affiliation, or because of their newsgathering activities.

12

454. All Plaintiffs listed herein reasonably believed that one or more of the above-named 13

defendants or their agents would direct the commission of violence or commit violence against 14

them to prevent Plaintiffs from exercising their civil rights and liberties and that each of the 15

defendants had the apparent ability to carry out such threats. Many of the Plaintiffs named herein 16

were the direct victims of such violence.

17

455. As a direct and legal result of Defendants' actions, Plaintiffs have suffered physical 18

harm and mental and emotional distress, have lost income and the ability to earn future income, and 19

have incurred medical and related expenses. The amount of general and compensatory damages 20

shall be proven at trial.

21

456. In doing the things hereinabove alleged, RIOT DEFENDANTS and Does 21-100, 22

and each of them, acted with deliberate disregard of the rights and safety of Plaintiffs and are 23

therefore liable for punitive damages in amounts sufficient to punish the defendants sued herein and 24

to deter future similar misconduct.

25

457. Plaintiffs intend to continue attending and participating in demonstrations but fear 26  
further assault and other retaliation.

27

28

- 73 -

COMPLAINT

1

**FOURTH CAUSE OF ACTION**

2

**For Violation of the Ralph Civil Rights Act of 1976, (Cal. Civil Code § 51.7)** 3

***By Graeme Blair, Thistle Boosinger, Shandra Campbell, James (Jimi) Peric Degen,  
Catherine Hamilton, Jakob Johnson, Isabella Lee, Binyamin Moryosef, Dolores  
Quintana, Bharat Venkat,***

4

***Angela Jit, Afnan Khawaja, and Roes 1, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, and 15.*** 5

***Against All Riot Defendants and Does 55-97***

6

458. Plaintiffs repeat and replead each of the allegations in the preceding paragraphs  
and 7

incorporate them by reference as though fully set forth herein.

8

459. Plaintiffs in this cause of action bring this cause of action against all RIOT 9

DEFENDANTS and Does 21-97.

10

460. All RIOT DEFENDANTS, and each of them, sued herein were engaged in at least 11  
some of the following acts: wielding makeshift clubs, boards, or other hard objects,  
charging at 12

and/or striking kicking, or attempting to blind Plaintiffs or persons near to Plaintiffs, spraying toxic 13

chemicals, hurling explosive or incendiary materials into the Palestine Solidarity Encampment, 14

hurling hard objects into the Palestine Solidarity Encampment, intending to cause harmful or 15

offensive contact.

16

461. In doing the things hereinabove alleged, the RIOT DEFENDANTS caused Plaintiffs 17

to reasonably fear that they would be hurt by being beaten, kicked, clubbed, sprayed, blinded, struck 18

by thrown objects, or hurt by burning or exploding objects.

19

462. In doing the things hereinabove alleged the RIOT DEFENDANTS were at least 20

partly motivated by the actual or perceived race, color, religion, ancestry, or national origin, of the 21

Plaintiffs or those whom they were among; or because of the actual or perceived race, color, 22

religion, ancestry, or national origin, of those with whom the Plaintiffs associated. 23

463. As a direct and legal result of the aforementioned acts or omissions, the Plaintiffs 24

named in this cause of action sustained and incurred damages, including pain, suffering, and 25

emotional injury.

26

464. In doing the things hereinabove alleged, RIOT DEFENDANTS and Does 55-97, and 27

each of them, acted with deliberate disregard of the rights and safety of Plaintiffs and are therefore 28

liable for punitive damages in amounts sufficient to punish the defendants sued herein and to deter

## COMPLAINT

1

future similar misconduct. All Defendants, and each of them, by doing and/or causing the acts 2

complained of in this entire Complaint, assaulted, battered, and intimidated Plaintiffs with threats of 3

violence because of Plaintiffs' perceived political affiliation and/or political beliefs, and in 4

retaliation for Plaintiffs' exercising their constitutional rights, or because of Plaintiffs' perceived 5

membership in or association with persons of a particular race, national origin, religion, or ethnic 6

affiliation.

7

465. There was no lawful justification for the RIOT DEFENDANTS to commit violence 8

against and threaten violence against the Plaintiffs because of their perceived political affiliation 9

while Plaintiffs were engaged in First Amendment activity or because of their perceived 10

membership in or association with persons of a particular race, national origin, religion, or ethnic 11

affiliation or because of their newsgathering activity.

12

466. As a legal result of the Defendants' unlawful conduct, the Plaintiffs have suffered 13

emotional distress, physical injury, loss of income and loss of future earning capacity, and pain and 14

suffering and are entitled to monetary damages.

15

467. In doing the things alleged above, the defendants sued in this cause of action, and 16  
each of them acted with deliberate disregard of the rights and safety of the Plaintiffs and  
are 17

therefore liable for punitive damages in amounts sufficient to punish the defendants sued  
herein 18

defendants and to deter future similar misconduct.

19

468. Plaintiffs intend to continue attending and participating in demonstrations but fear 20  
further assault and other retaliation.

21

### **FIFTH CAUSE OF ACTION**

22

#### **For Assault**

23

***By Graeme Blair, Thistle Boosinger, Shandra Campbell, James (Jimi) Peric Degen,  
Catherine Hamilton, Jakob Johnson, Isabella Lee, Binyamin Moryosef, Dolores  
Quintana, Bharat Venkat, 24***

***Angela Jit, Afnan Khawaja, and Roes 1, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, and  
15. Against All Riot Defendants and Does 55-97***

25

469. Plaintiffs repeat and replead each of the allegations in the preceding paragraphs  
and 26

incorporate them by reference as though fully set forth herein.

27

28

- 75 -

COMPLAINT

1

470. Plaintiffs bring this cause of action against all RIOT DEFENDANTS and Does 21- 2  
97.

3

471. All RIOT DEFENDANTS, and each of them, sued herein were engaged in at least 4  
some of the following acts: wielding makeshift clubs, boards, or other hard objects,  
charging at 5

Plaintiffs or persons near to Plaintiffs, spraying toxic chemicals, hurling explosive or  
incendiary 6

materials into the Palestine Solidarity Encampment, hurling hard objects into the  
Palestine 7

Solidarity Encampment. Each of these acts was intended to cause harmful or offensive  
contact or 8

make the plaintiffs fearful that they would be so harmed.

9

472. In doing the things hereinabove alleged, the RIOT DEFENDANTS caused Plaintiffs 10  
to reasonably fear that they would be hurt by being beaten, clubbed, sprayed, struck by  
thrown 11

objects, or hurt by burning or exploding objects.

12

473. As a direct and legal result of the aforementioned acts or omissions, the Plaintiffs 13  
named in this cause of action sustained and incurred damages, including pain, suffering,  
and 14

emotional injury.

15

474. In doing the things hereinabove alleged, the RIOT DEFENDANTS and Does 21-100, 16  
and each of them, acted with deliberate disregard of the rights and safety of Plaintiffs and  
are 17

therefore liable for punitive damages in amounts sufficient to punish the defendants sued herein and 18

to deter future similar misconduct.

19

#### **SIXTH CAUSE OF ACTION**

20

#### **For Battery**

21

***By Graeme Blair, Thistle Boosinger, Shandra Campbell, James (Jimi) Peric Degen, Catherine Hamilton, Isabella Lee , Dolores Quintana, Roe 11, Bharat Venkat, Angela Jit, Afnan Khawaja, 22***

***and Roes 1, 3, 5, 6, 8, 9, 10, 12, 13, 14, and 15***

***Against All Riot Defendants and Does 55-97***

23

475. Plaintiffs repeat and replead each of the allegations in the preceding paragraphs and 24

incorporate them by reference as though fully set forth herein.

25

476. Plaintiffs bring this cause of action against all RIOT DEFENDANTS and Does 21- 26

197.

27

28

- 76 -

#### **COMPLAINT**

1

477. All RIOT DEFENDANTS, and each of them, sued herein were engaged in at least 2

some of the following acts: striking Plaintiffs with makeshift clubs, boards, or other hard objects, 3

spraying toxic chemicals, hurling explosive or incendiary materials into the Palestine Solidarity 4

Encampment, hurling hard objects into the Palestine Solidarity Encampment, and otherwise 5

intending to cause harmful or offensive contact.

6

478. In doing the things hereinabove alleged, the RIOT DEFENDANTS and Does 55-97 7 harmed Plaintiffs.

8

479. As a direct and legal result of the aforementioned acts or omissions, the Plaintiffs 9 named in this cause of action sustained and incurred damages, including pain, suffering, and 10

emotional injury.

11

480. In doing the things hereinabove alleged, the RIOT DEFENDANTS and Does 21- 12 100, and each of them, acted with deliberate disregard of the rights and safety of Plaintiffs and are 13

therefore liable for punitive damages in amounts sufficient to punish the defendants sued herein and 14

to deter future similar misconduct.

15

## **SEVENTH CAUSE OF ACTION**

16

### **For Negligent Failure to Perform a Mandatory Duty**

17

### **In Violation of Government Code § 815.6**



18

***By Plaintiffs Graeme Blair, Thistle Boosinger, Shandra Campbell, James (Jimi) Peric Degen, Catherine Hamilton, Jakob Johnson, Isabella Lee , Binyamin Moryosef, 19***

***Dolores Quintana, Bharat Venkat, Angela Jit, Afnan Khawaja, and Roes 1, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, and 15***

20

***Against the Regents of the University of California***

21

22

481. Plaintiffs repeat and replead the allegations of the preceding paragraphs and 23  
incorporate them as though fully set forth herein.

24

482. California Government Code §11135 imposes upon the Regents a mandatory duty  
to 25

take reasonable steps to ensure that no person is unlawfully subjected to discrimination  
under any 26

program that is funded directly by the state or receives any financial assistance from the  
state and 27

that no person is denied full and equal access to benefits.

28

- 77 -

COMPLAINT

1

483. Plaintiffs were subjected to discrimination or denied full and equal access to  
benefits 2

based on their actual or perceived race or color. Religion, ancestry, national origin, ethnic  
group 3

identification, or because of their association with persons falling into one or more of those actual or 4

perceived protected classes.

5

484. The Regents' failure (or refusal) to perform their mandatory duty under Government 6  
Code §815.6 was a direct and legal cause of the Plaintiffs suffering mental and emotional  
distress, 7

losing income and the ability to earn future income, and incurring medical and related  
expenses. 8

The amount of general and compensatory damages shall be proven at trial.

9

485. As a direct and legal result of the aforementioned acts or omissions, the Plaintiffs 10  
named in this cause of action sustained and incurred damages, including pain, suffering,  
and 11

emotional injury.

12

#### **EIGHTH CAUSE OF ACTION**

13

#### **For Negligence**

14

***By Plaintiffs Graeme Blair, James (Jimi) Peric Degen, Catherine Hamilton, Jakob  
Johnson, Isabella Lee, Binyamin Moryosef, Bharat Venkat, and Roes 1, 3, 5, 6, 8, 9, 10,  
12, 13, 14, and 15*** 15

***Against Michael v. Drake, Eugene "Gene" Block, Darnell Hunt, Michael J. Beck,  
Monroe Gorden, Jr., Richard "Rick" Braziel, Does 1-20, and the Regents of the  
University of California*** 16

486. Plaintiffs repeat and replead the allegations of the preceding paragraphs and 17  
incorporate them as though fully set forth herein.

18

487. At all times material hereto, each of the individual defendants sued in this cause  
of 19

action was working and acting entirely within the course and scope of their respective roles  
as 20

officials employed by the Regents of the University of California.

21

488. Beginning on the first day of the Palestine Solidarity Encampment and continuing 22  
through the brutal mob assault on the night of April 30, 2024, each of the individual  
defendants 23

sued in this cause of action was repeatedly warned of escalating threats and violent acts  
carried out 24

against encampment members.

25

489. Despite (or perhaps because of) the mounting risk of grave harm to students,  
faculty, 26

and staff inside of the Solidarity Encampment, and other students who were nearby as  
reporters for 27

28

- 78 -

## COMPLAINT

1

UCLA's student newspaper, the individual defendants turned their backs on the Plaintiffs  
and took 2

no reasonable steps to protect them from the dangers they faced.

3

490. In doing the things hereinabove alleged, the Individual Defendants and Does 1-20 4  
harmed Plaintiffs.

5

491. As a direct and legal result of the aforementioned acts or omissions, the Plaintiffs 6  
named in this cause of action sustained and incurred damages, including pain, suffering,  
and 7  
emotional injury.

8

492. Pursuant to Government Code §815.2, the Regents are vicariously liable for the 9  
injuries caused by their employees and agents.

10

#### **NINTH CAUSE OF ACTION**

11

#### **For False Arrest in Violation of Article I, §13 of the California Constitution** 12

***By Plaintiffs Joseph Murphy, Aaron Palmer, Eric Wefald, Mahmoud Elnaouq, and Roes  
1, 4, 6, 8, 9, 10, and 11.***

13

***Against the Regents of the University of California, the California Highway Patrol, and  
The City Of Los Angeles***

14

493. Plaintiffs repeat and replead the allegations of the preceding paragraphs and 15  
incorporate them as though fully set forth herein.

16

494. Defendants UCPD, LAPD, and CHP unlawfully and without legal justification 17  
caused the arrests of Plaintiffs Eric Wefald, and Roes 6, 7, 8, 9, 10, and 12 on May 2,  
2024 18

495. Defendants UCPD, LAPD, and CHP unlawfully and without legal justification 19  
caused the arrests of Plaintiffs Joseph Murphy, Aaron Palmer, Mahmoud Elnaouq, and Roes  
1 and 20

4 on June 10, 2024.

21

496. On both May 2, 2024, and June 10, 2024, Defendants caused Plaintiffs' arrest 22  
without warrant or probable cause.

23

497. Defendants lacked probable cause to arrest or cause the arrests of Plaintiffs on  
either 24

May 2, 2024, or June 10, 2024, because there was no underlying criminal offense that could  
justify 25

the unlawful assembly declaration, which was based solely on violations of university  
policy, not 26

any criminal offense, violence, imminent threat of danger, as required by California law.  
*See In re* 27

28

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## COMPLAINT

1

*Brown*, 9 Cal. 3d at 624 ("An unlawful act within the meaning of section 407 . . . means  
criminal 2

conduct prohibited by state law.").

3

498. Because the unlawful assembly declaration was itself unlawful, there was no 4  
probable cause to arrest for failure to disperse under California Penal Code section 409,  
which 5

applies only when an individual has been "lawfully warned to disperse."

6

499. Moreover, when Defendants arrested Plaintiffs, they failed to make any effort to 7

distinguish between the participants in any unlawful activity and innocent bystanders, as required to 8

carry out a lawful arrest for failure to disperse under Penal Code section 409. *See Dubner v. City & 9*

*Cnty. of San Francisco*, 266 F.3d 959, 967 (9th Cir. 2001).

10

500. Defendants acted in the performance of their official duties when they directed, 11 caused, and effectuated the arrest of Plaintiffs.

12

501. As a direct and legal cause of Defendants' actions and omissions, Plaintiffs were 13 arrested without probable cause and in violation of Article 1, Section 13 of the California 14

Constitution.

15

502. As a direct and legal result of Defendants' actions, Plaintiffs have suffered physical 16

harm and mental and emotional distress, have lost income and the ability to earn future income, and 17

have incurred medical and related expenses. The amount of general and compensatory damages 18

shall be proven at trial.

19

503. As a direct and legal result of the Defendants' actions, the Plaintiffs who were 20 students have faced unwarranted disciplinary action merely because of their false and unlawful 21

arrests, interrupting their education and depriving them of graduation, academic, and employment 22

opportunities.

23

//

24

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25

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26

//

27

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28

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COMPLAINT